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SEC v. PFG, LLC

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Invoice Date: April 30, 2014
End of Billing Date: Apr 30/14

Attention: Securities Exchange Commission

Client #: 676

Inv #: 10658

RE: SEC v. Aubrey Lee Price; PFG LLC et al, Case No. 1:12-cv-2296

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-01-14	[Asset analysis and recovery] Emails with counsel regarding phone call with Mr. Price; review website for Bulloch County Jail.	0.20	53.00	GFG
Feb-03-14	[Asset analysis and recovery] Conference with counsel regarding subject matter and other conditions of meeting with A.L. Price (0.1); review email of counsel to Mr. Price (0.1).	0.20	53.00	GFG
	[Asset analysis and recovery] Research and draft response to Life Insurance motions to intervene.	1.60	424.00	GFG
	[Asset analysis and recovery] Review tax documents from Genworth and other parties.	0.10	26.50	GFG
	[Asset analysis and recovery] Telephone call and email to criminal counsel for A. Price regarding scheduling date and time to meet with A. Price (.2); strategize regarding information obtained from Jim Price related to pending litigation matters (.3); emails to and from counsel for SEC regarding the insurance companies' Motions to Intervene and scheduling call to discuss response (.2); review Notice from IRS and coordinate resending request for tax return and transcript for Montgomery Asset Management with cover letter and Receivership Order (.2); review	1.70	450.50	KDM

EXHIBIT B

updated insolvency/fraud analysis from forensic accountant and strategize with forensic accountant regarding further analysis to be done regarding value of real properties and shares in MCBI and date that Defendants first became insolvent and/or perpetrated a fraud (.5); emails to and from real estate counsel regarding whether ownership of a note and guaranty may be split between two parties such that one may pursue the guarantors and the other may foreclose on the property and coordinate research into this issue (.3).

[Asset analysis and recovery] (KM Homes) Review Google's motion for reconsideration of order enforcing Subpoena and Memorandum in support and Notice of Appearance filed by Google's counsel and coordinate updating of Service List (.3); review letter from proposed mediator regarding procedures and fees for the mediation and strategize regarding mediation and preparation of mediation statement (.2).	0.50	132.50	KDM
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[Business operations] Review 1099 from insurance company and coordinate forwarding to tax consultant for purposes of preparation of tax returns (.1).	0.10	26.50	KDM
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[Case administration] Review distribution plan [0.5]; review FDIC's objections to distribution plan [0.7]; Prepare section of status report regarding liquidation plan and details thereto [1.2].	2.40	360.00	DMC
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Feb-04-14	[Asset analysis and recovery] Meet with counsel regarding status and strategy.	0.30	79.50	MME
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[Business operations] E-mailing regarding farm operation issues and harvest.	0.70	185.50	MME
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[Asset analysis and recovery] Emails with counsel regarding insolvency analysis, review forensics regarding insolvency.	0.20	53.00	GFG
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[Asset analysis and recovery] Communications ~	0.10	26.50	GFG
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with Mr. Lowther regarding subject matter of A. L. Price interviews and scheduling.

[Asset analysis and recovery] Emails with counsel for PFG, LLC's former law firm regarding settlement scheduling.	0.10	26.50	GFG
[Asset analysis and recovery] Emails to and from counsel for SEC regarding insurance companies' Motions to Intervene and confirm conference call for discuss issues raised in Motions and strategy for response brief (.1); telephone call with counsel for SEC regarding the insurance companies' motions to intervene, arguments to be made and legal authority to be cited in omnibus response to all three Motions, filing of Sixth Status Report, preparation of Reply in Support of Motion to approve claims process and distribution plan, and possible compromise with FDIC-R regarding proposed initial distribution (.6); email from counsel for SEC with statutory and case law in support of the Receiver's arguments against the insurance companies' Motion to Intervene and review that authority (.5); strategize regarding research issue of whether a party holding a guaranty can collect from the guarantor if it does not also hold the underlying note (.2); continue analyzing updated forensic report regarding insolvency/fraud/ponzi analysis and strategize regarding commencement of fraudulent activity and insolvency of Defendants as compared to dates Price incurred trading losses (.8); emails to and from counsel for R. Price regarding A. Price's meeting with Receiver (.3); emails to and from criminal defense counsel for A. Price regarding status of his negotiations of plea agreements with the AUSA for the S.D. Ga. and for the E.D.N.Y., coordinating a meeting with A. Price in the presence of counsel, his client's willingness to cooperate with the Receiver, and scheduling call with counsel, and strategize regarding upcoming call with counsel (.3).	2.80	742.00	KDM
[Case administration] Review and revise Sixth	2.90	768.50	KDM

Report of Receiver and coordinate further revisions and additions (2.9).

	[Asset analysis and recovery] Review outstanding research issues [0.2]; review facts surrounding Longboat Key property [0.3]; research regarding standing to sue under guaranty [1.2]	1.70	255.00	DMC
Feb-05-14	[Asset analysis and recovery] Emails with counsel and the Receiver regarding subject matter of A. L. Price interviews and review draft power of attorney.	0.10	26.50	GFG
	[Asset analysis and recovery] Telephone conferences with Jim Price regarding Mr. Price's desire to meet with the Receiver and/or her counsel; emails and conference with client regarding clearance for interviews and permitted subject matter.	0.50	132.50	GFG
	[Asset analysis and recovery] Telephone conference with counsel for Mr. Price, Mr. Lowther, regarding subject matter of conferences and questions, conference with counsel regarding strategy for Price interview(s).	0.50	132.50	GFG
	[Asset analysis and recovery] Email from Jim Price regarding Receiver ability to recover assets (.1); review and strategize regarding response to Jim Price's email (.1); strategize with Receiver and team members regarding contacting A. Price's criminal defense counsel to arrange telephone call with A. Price regarding recovery of assets from Venezuela (.4); receive report regarding outcome of latest call with criminal defense counsel for A. Price and his agreement to permit limited questions to be posed to A. Price related to Receiver's claims in pending litigation matters and the execution of the power of attorney, and strategize regarding questions to be posed to A. Price (.5); emails to and from investor regarding communications with A. Price, status of receivership and pending litigation matters, and timing of filing next Status Report of Receiver (.2); review letter from investor	1.50	397.50	KDM

with Claim Form and supporting documentation and coordinate updating investor contact information and claims tracking chart (.2).

[Case administration] Continue working on having new attorney with Pettitt Worrell designated as local counsel for actions in Georgia and confirming Receiver's consent to new designation (.1).	0.10	26.50	KDM
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[Case administration] Review edits to sixth status report [0.3]; make revisions to status report for submission to Receiver [1.9]; revise inventory of assets [0.2]; review reconciliation [0.2] and confer regarding incoming wires [0.1]; review and gather exhibits to finalize report [0.4].	3.10	465.00	DMC
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[Fee and Employment Application] (No charge) Gather and review invoices from local counsel and forensic accountants [0.6]; e-mails with counsel regarding latest invoices [0.2].	0.80	0.00	DMC
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[Fee and Employment Application] (No charge) Begin working on fee application.	0.90	0.00	DMC
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[Asset analysis and recovery] Assist attorney D. Carnright in gathering exhibits to Receiver's Sixth Status Report for final review.	0.40	30.00	pl
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Feb-06-14 [Asset analysis and recovery] Conference regarding written questions for Mr. Price and draft; emails with counsel for Mr. Price including questions requested and attaching newest versions of the complaint in the Bankshares case.	1.30	344.50	GFG
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[Asset analysis and recovery] Research and draft response to Life Insurance motions (1.7); review FDIC-R's objections to claims procedure and review record regarding response (.8).	2.50	662.50	GFG
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[Asset analysis and recovery] Review emails with criminal defense counsel for A. Price requesting information necessary for pending	0.50	132.50	KDM
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actions against MCBI and officers and directors and against KM Homes and for potential claims against other third parties, and review and strategize regarding information and support requested from A. Price (.3); review tax transcript from IRS regarding Montgomery Asset Management (MAM) for purposes of investigating with MAM has right to tax refund and coordinate analysis by tax consultant (.2).

	[Asset analysis and recovery] (KM Homes) Review Order granting Google's Motion to vacate Order directing Google to produce records and strategize regarding impact of order on the case (.2).	0.20	53.00	KDM
	[Fee and Employment Application] (No charge) Work on fee application [0.7]; review time entries from associate counsel [0.3].	1.00	0.00	DMC
Feb-07-14	[Asset analysis and recovery] Research and revise Response to three motions filed by life insurance companies (undisputed facts, defenses to proposed claims and application of intervention standard).	5.90	1,563.50	GFG
	[Asset analysis and recovery] (KM Homes) Confer regarding Defendant's request for consent to Defendant's motion to reopen discovery for limited purposes (.1); review Defendant's motion to reopen discovery (.2).	0.30	79.50	KDM
	[Case administration] Telephone calls to and from investor regarding status of receivership and confirm that we have his updated contact information (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Review tax return transcript for Montgomery Asset Management (0.2); Email transcript to Lesley Johnson (0.1).	0.30	45.00	AF
	[Fee and Employment Application] (No charge) Work on fee application.	1.20	0.00	DMC

	[Fee and Employment Application] (No charge) E-mails with counsel regarding updated invoices.	0.20	0.00	DMC
Feb-10-14	[Asset analysis and recovery] Extended telephone conference with counsel for the FDIC-R, Alan Curley, regarding issues related to cross claims with the FDIC-R and review relevant statutes regarding related issues, conference with counsel for the Receiver regarding possible structure of claims process procedures.	0.80	212.00	GFG
	[Asset analysis and recovery] Review emails with criminal counsel for A. Price regarding information requested from A. Price in support of Monitor's claims in pending litigation matters and coordinate efforts to follow up with counsel (.2); strategize regarding latest call with counsel for the FDIC-R regarding the FDIC-R's claims against the Receivership Estate, its intention to file counterclaim against the Receiver in action brought by Receiver against FDIC-R, potential terms of settlement of those claims and counterclaim, status of FDIC-R's claims against Convergenx Prime and Goldman Sachs, revisiting issues addressed during settlement conference between Receiver, SEC and FDIC-R, legal issues underlying the Receiver's and FDIC-R's respective claims against each other, and advancing settlement discussions between the parties (.7); review email from counsel for the FDIC-R regarding law applicable to releases and waivers for purposes of negotiations of a settlement of the action brought by the Receiver in the S.D. Ga. (.2); email from counsel for FDIC-R regarding latest revisions to Partial Settlement Agreement and Assignment Agreement resolving real property issues between the Receiver and the FDIC-R and begin reviewing latest revised agreements (.4); review response from IRS to request for tax transcript and the transcript for a particular receivership entity and coordinate forwarding to tax consultant and determining whether additional documents are required from the IRS to determine whether Estate is entitled to a tax refund (.2).	1.70	450.50	KDM

	[Case administration] Review final revisions of the Receiver to the Sixth Status Report, coordinate making those final revisions and finalizing and filing Report and its Exhibits (.4).	0.40	106.00	KDM
	[Asset analysis and recovery] Review statute of limitations analysis [0.4]; continue creating investor information spreadsheet and work on gathering information for calls to net winners regarding tolling agreements and potential claims [0.5].	0.90	135.00	DMC
	[Case administration] Revise and finalize status report [0.6]; and exhibits [0.3] and assist in filing of same [0.2].	1.10	165.00	DMC
	[Fee and Employment Application] (No charge) Review invoices from all professionals [0.4]; Work on fee application [1.2]; emails with local counsel and private investigator regarding invoices [0.2].	1.80	0.00	DMC
Feb-11-14	[Asset analysis and recovery] Email from Jim Price regarding his recent call with A. Price and A. Price's attorney's agreement to permit A. Price to speak with Receiver and counsel and cooperate in connection with recovering assets and prosecuting claims against third parties (.1); email from criminal counsel to A. Price consenting to us speaking with A. Price regarding the issues presented to counsel for approval (.1); strategize regarding in-person meeting or telephone call with A. Price from jail and coordinate calls to A. Price's counsel and Jim Price to arrange for a call with A. Price (.2).	0.40	106.00	KDM
	[Case administration] Coordinate sending Sixth Report of Receiver along with Exhibits to website manager to have them posted to website and review website to confirm that it is up to date (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Conference regarding transcripts of tax returns received from IRS (0.1).	0.10	15.00	AF

	[Fee and Employment Application] (No charge) Work on fee application.	0.90	0.00	DMC
Feb-12-14	[Asset analysis and recovery] (KM Homes) Review Response in Opposition to Motion to Re-Open limited discovery period filed by Google and strategize regarding discovery sought (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (MCBI) Confer with Receiver and team members regarding requesting a further extension of time to file Third Amended Complaint in light of delay in obtaining consent from A. Price's criminal counsel to meet with A. Price to discuss facts underlying Receiver's claims against MCBI and officer and directors (.2); review emails to and from counsel for Defendants regarding request for extension of time to file Third Amended Complaint and no objection by Defendants (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] Review letter from Metlife regarding closing of claim in light of reappearance of A. Price (.1); email from Lee Price regarding arranging with jail for telephone call with A. Price and strategize regarding having Lee Price facilitate call from A. Price from jail (.2); strategize with team members regarding arranging for meeting at jail or having A. Price call our office to address certain questions approved by A. Price's criminal counsel related to the Receiver's actions against KM Homes and MCBI and officer and directors (.8).	1.10	291.50	KDM
	[Asset analysis and recovery] Continue research regarding standing to sue upon guaranty.	0.60	90.00	DMC
	[Asset analysis and recovery] Review correspondence from Metlife regarding life insurance policy proceeds.	0.10	15.00	DMC
	[Fee and Employment Application] (No charge) Review invoice of separate insurance counsel for January 2014.	0.20	0.00	DMC

	[Fee and Employment Application] (No charge) Work on fee application.	0.90	0.00	DMC
Feb-13-14	[Asset analysis and recovery] (KM Homes) Review Notice by KM Homes of intent to file reply brief in support of its motion to reopen discovery to serve Subpoena on Google (.1); follow up on coordinating interview with A. Price by telephone or in-person and communications with A. Price's criminal counsel and his father (.2).	0.30	79.50	KDM
	[Asset analysis and recovery] (MCBI action) Review final version of Motion for extension of time to file Third Amended Complaint and follow up on obtaining consent from other Defendants and filing of Motion (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (No charge) Review correspondence from IRS and assist with request for tax transcript of certain Defendants.	0.10	0.00	DMC
	[Fee and Employment Application] (No charge) Review and revise invoice from real estate counsel.	0.20	0.00	DMC
	[Fee and Employment Application] (No charge) Work on fee application [0.5]; add section regarding work performed by real estate counsel from information gathered from time entries [0.5].	1.00	0.00	DMC
	[Fee and Employment Application] E-mail with M. Brooks regarding firm invoices.	0.10	15.00	DMC
	[Asset analysis and recovery] Telephone call to MCBI attorney regarding consent for extension of time to file 3rd amended complaint (.1); prepare draft motion for extension of time to file third amended complaint and proposed order regarding same for attorney G. Giberson's review. (.4)	0.50	37.50	pl
	[Asset analysis and recovery] (No charge) File Motion for Extension of Time to File Third Amended Complaint electronically.	0.10	0.00	pl

Feb-14-14	[Asset analysis and recovery] Research and revise response to motions by life insurance companies to intervene in action (claims process arguments).	8.30	2,199.50	GFG
	[Asset analysis and recovery] Review latest notice from IRS in response to request for tax transcripts and tax returns, receive report regarding tax consultant's advice in light of latest notice, and strategize regarding further investigation to be done to determine if any Receivership entity is entitled to a tax refund (.3); email from investor regarding recent correspondence from A. Price and his willingness to cooperate with Receiver to recover assets, review letter and follow up on scheduling meeting with A. Price (.3).	0.60	159.00	KDM
	[Asset analysis and recovery] (MCBI action) Review Order granting Motion for Extension of Time to file Third Amended Complaint and coordinate calendaring of new deadline (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Review documents returned by IRS regarding PFGBI (0.2); Email to K. Murena regarding transcript for PFGBI (0.1); Email to Lesley Johnson regarding the transcripts for Montgomery Asset Management (0.1); Email from and to Lesley Johnson regarding tax refunds from partnership and filing of Form 941 (0.2); Email to K. Murena regarding filing Form 941 for entities (0.1).	0.70	105.00	AF
	[Asset analysis and recovery] Work on net winner database regarding statute of limitations analysis.	0.60	90.00	DMC
	[Fee and Employment Application] (No charge) Work on fee application [3.2]; e-mails to associate counsel regarding invoice [0.1].	3.30	0.00	DMC
Feb-16-14	[Asset analysis and recovery] Review and revise response to motions to intervene from insurance carriers.	1.50	397.50	MME
Feb-17-14	[Asset analysis and recovery] Research and revise response to insurance companies'	5.70	1,510.50	GFG

motion to intervene with attachments (1.5); review letters sent to investors and discuss with counsel (.4) revise motion pursuant to comments of the Receiver and pursuant to comments of co-counsel (.8); review and revise omnibus response to insurance company motions (3.0).

<p>[Asset analysis and recovery] Review and revise Omnibus Response in Opposition to Insurance Companies' Motions to Intervene (2.4); review certain cases cited in Response and strategize with Receiver and team members regarding arguments asserted in Response, case law and statutory law supporting our arguments, and further revisions to be made to the Response (.5); confer with team members regarding assembling, bates labeling, and performing final review of all documents to be produced to FBI in response to grand jury subpoena (.2); receive update regarding tax consultant's analysis of tax transcripts received from IRS in response to our requests, determination of whether partnership filings were correct for Receivership Entities, and continued investigation into whether Estate is entitled to tax refunds (.3); strategize regarding latest negotiations with counsel for the FDIC-R regarding resolving claims between Receiver and FDIC-R underlying action in S.D. Ga. and the SEC enforcement action and receivership, and formulate legal arguments to be made in Reply to FDIC-R's Response in Opposition to Receiver's Motion to approve claims and distribution process, and in response to FDIC-R's claimed powers under 1821(j) to attach the assets of the Estate or have priority to those assets over the other creditors and investors, notwithstanding the Receivership Order and the Receivership Court jurisdiction over those assets (.5).</p>	3.90	1,033.50	KDM
<p>[Asset analysis and recovery] Email to Lesley Johnson regarding filing of 1065 forms (0.1); Review email from L. Johnson regarding filing partnership taxes (0.1).</p>	0.20	30.00	AF

	[Asset analysis and recovery] Assist G. Giberson in finalizing Omnibus Response to Insurance Companies Motions to Intervene and Memorandum of Law.	1.50	112.50	pl
Feb-18-14	[Asset analysis and recovery] Attention to scheduling and preparing for meeting with Aubrey Lee Price.	1.70	450.50	GFG
	[Asset analysis and recovery] Assist with final revisions to Omnibus Response to Insurance Companies' Motions to Intervene and strategize regarding preparation of motion to exceed page limitation (.5); review final versions of Omnibus Response and motion to exceed page limitation and proposed Order (.4); follow up with scheduling meeting with A. Price (.2); continue assisting with gathering documents responsive to FBI's grand jury subpoena (.4).	1.50	397.50	KDM
	[Fee and Employment Application] (No charge) Work on fee application.	0.90	0.00	DMC
	[Asset analysis and recovery] Assist attorney G. Giberson in preparing Motion to Exceed the Page Limit to File her Omnibus Memorandum in Opposition to the Life Insurance Companies' Motions and proposed order regarding same (.3); assist attorney G. Giberson in finalizing the Receiver's Omnibus Memorandum of Law in Opposition to the Life Insurance Companies' Motions (1.7).	2.00	150.00	pl
Feb-19-14	[Asset analysis and recovery] Review Order granting motion for leave to exceed page limitation for Omnibus Response to Insurance Companies' Motions to Intervene (.1); strategize with Receiver and team members regarding issues to be addressed at upcoming meeting with A. Price and logistics for arranging and attending that meeting, and investigating whether others have met with him in jail (.4); emails to and from FBI regarding visitors of A. Price in jail (.1); email from counsel for investor who transferred funds to SunTrust account of PFG and follow	0.80	212.00	KDM

up on obtaining bank statements for that account to confirm investment (.2).

[Fee and Employment Application] (No charge) Review invoices [0.5]; calculate total amount of fees and costs, including holdback amounts for invoices already received [0.6]; revise fee application [0.5].	1.60	0.00	DMC
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Feb-20-14	[Asset analysis and recovery] Telephone conferences and emails with counsel for investors regarding FDIC subpoenas and related issues (0.5); emails with Mr. Chapman and review subpoena (0.4); telephone conference with Mr. Curley regarding subpoenas and related issues (0.4).	1.30	344.50	GFG
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[Asset analysis and recovery] (KM Homes) Conduct interview of Aubrey Lee Price, prepare summary of interview, telephone conferences with counsel regarding substance of interviews (2.9), review KM Homes claims based on results of interview (1.5).	4.40	1,166.00	GFG
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[Asset analysis and recovery] (No charge) Travel to Bulloch County Jail (2.7).	2.70	0.00	GFG
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[Asset analysis and recovery] (No charge) Travel from Bulloch County Jail (3.1).	3.10	0.00	GFG
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[Asset analysis and recovery] Work on following up with SunTrust to obtain statements for previously unknown account of PFG for which the bank had not previously produced documents and prepare and send response to counsel for investors inquiring regarding the status of his client's transfers to that SunTrust account (.2); telephone call from FBI regarding amounts invested and lost by investors and updated forensic analyses, and review and send those analyses to FBI (.5); emails to and from forensic accountant regarding updated charts illustrating flow of funds to and from the Receivership Defendants (.2); email from FBI regarding status of investigation into visitors of A. Price in jail (.1); receive update regarding IRS's response	1.70	450.50	KDM
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to our request for tax returns and transcripts of tax file for Montgomery Asset Management (.1); receive report regarding in-person interview with A. Price, the information he provided related to the Receiver's claims against KM Homes and against MCBI and its former officers and directors, and his interest in assisting the Receiver to recovery assets for the investors, and strategize regarding obtaining authority from his criminal defense counsel to meet with A. Price in the future to discuss various other matters with which he can assist the Receiver (.4); confer with the Receiver regarding the in-person interview with A. Price, information he provided and scheduling another interview by the Receiver to discuss a broader ranger of subjects (.2).

	[Asset analysis and recovery] Review rejection checklist sent by IRS for Montgomery Asset Management tax return transcript request (0.1); Review emails regarding document requests from SunTrust bank (0.1); Conference regarding production of documents by SunTrust bank (0.1).	0.30	45.00	AF
	[Asset analysis and recovery] Review response letters and documents produced from net winners [0.5]; confer with J. Serna regarding contact information for certain net winners [0.2]; work on document and response spreadsheet relating to net winners and statutes of limitations [0.4].	1.10	165.00	DMC
	[Fee and Employment Application] (No charge) Calculate fee amounts from all counsel and invoices to include hold backs and costs incurred [1.4]; work on fee application [1.2].	2.60	0.00	DMC
Feb-21-14	[Asset analysis and recovery] (MCBI Action) Work on MCBI amended complaint based on interview and review files regarding same (7.7).	7.70	2,040.50	GFG
	[Asset analysis and recovery] Email and telephone call from investor J. Michael regarding recent call from FDIC inspector general and status of Receivership including	1.90	503.50	KDM

recent interview of A. Price and his willingness in cooperating with Receiver to recover assets for the investors (.3); review email from investor J. Michael to FDIC inspector regarding recent communications with A. Price and review letter from Price to J. Michael (.2); emails with local counsel regarding expiration of stay in action against FDIC-R and deadlines that will become effective upon lifting of the stay, and strategize regarding settlement negotiations with FDIC-R (.4); emails to and from forensic accountant regarding updated forensic reports and pictorial charts illustrating the flow of funds to and from the Receivership Defendants, review and analyze those reports and charts, and request additional reports and charts showing other aspects of the flow of funds for purposes of providing FBI with the updated information it is seeking from Receiver (1.0).

[Case administration] (No charge) Review and revise invoices for Receiver and her counsel for purposes of Sixth Fee Application (2.5).

2.50

0.00

KDM

[Fee and Employment Application] (No charge) E-mails to and from SD Ga. counsel regarding invoice [0.2]; review invoice from SD Ga counsel [0.1].

0.30

0.00

DMC

Feb-22-14

[Asset analysis and recovery] (MCBI Action) Review files and revise MCBI complaint pursuant to information provided by Mr. Price, revise proof of case.

6.30

1,669.50

GFG

Feb-23-14

[Asset analysis and recovery] E-mails with team members regarding status of statute of limitations analysis.

0.20

30.00

DMC

[Fee and Employment Application] (No charge) E-mails with private investigator and Venezuela counsel regarding invoices [0.3]; review invoices submitted by same and calculate total fees, costs and holdback amounts for each [0.5].

0.80

0.00

DMC

	[Fee and Employment Application] (No charge) Work on fee application.	0.60	0.00	DMC
Feb-24-14	[Case administration] (No charge) Review invoices.	0.80	0.00	MME
	[Asset analysis and recovery] Review file regarding claims against PFG's former counsel (.4); review file regarding additional potential claims of the Receiver and regarding MCBI related claims (2.1); emails and conference with counsel regarding assets issues (power of attorney and information obtained at interview, and regarding real estate) (.6).	3.10	821.50	GFG
	[Asset analysis and recovery] Emails to and from forensic accountant regarding updated forensic reports and pictorial charts and prepare and send email to FBI with updated charts (.3); follow up on demands to potential fraudulent transferees and investors with net gains, and receive report regarding status of completion of analysis of statute of limitations applicable to each transfer to fraudulent transferees and net winners, and contacting net winners to enter into tolling agreements (.3); work with team members on completing analysis necessary to update list of potential fraudulent transferees and report to Receiver status of commencing clawback claims, entering into tolling agreements, and locating certain fraudulent transferees (.3); confer with Receiver regarding Power of Attorney necessary to recover assets from Venezuela and follow up on and obtain confirmation of Price's execution of Power of Attorney (.1); telephone calls to and from FBI regarding our interview with A. Price and his visitors in jail (.2); follow up on investigation into early transfers from investors to SunTrust account of PFG and obtaining the relevant statements from bank to confirm receipt of funds and coordinate completing review of all SunTrust statements received and contacting SunTrust to obtain additional records, determine need to send follow-up Subpoena, review and approve document request in Subpoena, and coordinate service of Subpoena (.3).	1.50	397.50	KDM

	[Case administration] Emails to and from counsel for investor regarding status of Court's approval of the claims administration process and proposed form to be used to submit claim (.2).	0.20	53.00	KDM
	[Case administration] (No charge) Review and revise invoices of counsel for Receiver for purposes of preparation of Sixth Interim Fee Application and conference with Receiver regarding invoices and status of preparation of Fee Application (2.5).	2.50	0.00	KDM
	[Fee and Employment Application] (No charge) Work on calculation of fees costs and holdback amounts.	0.70	0.00	DMC
Feb-25-14	[Asset analysis and recovery] (KM Homes) Research and draft motion to add PFGRE as party plaintiff.	3.20	848.00	GFG
	[Asset analysis and recovery] Telephone conference with Mr. Curley regarding possible claims resolution schedule and emails with counsel for the FDIC-R, Alan Curley.	0.40	106.00	GFG
	[Asset disposition] Emails to and from realtor regarding expiration and renewal of listing agreement for Longboat Key property and recommendation for reduction in asking price and strategize regarding renewal of agreement and setting asking price (.2); emails to and from realtor regarding appraisal performed on Longboat Key property and obtaining copy from FDIC-R (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] Review executed Powers of Attorney signed by A. Price, confer with team members regarding updating them and arranging for call with Venezuela counsel and having them sent to counsel (.2); review Subpoena from FDIC to counsel for various investors in FINRA actions and email from that counsel regarding correspondence requested by FDIC-R proposed to be produced, review those correspondence and strategize regarding possible bases for objecting to production and	1.90	503.50	KDM

applicable privileges (.4); telephone call with counsel for FDIC-R regarding subpoena to counsel for various investors, agreement to extension of time to file Reply in support of Receiver's Motion to approve claims process and distribution plan, evidence in support of claims against KM Homes and MCBi and its officers and directors, the FDIC-R's claims against certain financial institutions, various issues related to Receiver's action against the FDIC-R in S.D. Ga. and the FDIC-R prospective counterclaim, the parties' claims against the respective receivership estates, issues related to the exchange of releases between the parties in the event of settlement, and attempt to narrow the issues to pave the way for a settlement of all disputes between the parties (1.2); email from counsel for FDIC-R requesting further extension of time to respond to any amended complaint that we may file in the action against the FDIC-R in the S.D. Ga. and strategize regarding providing consent to such extension of time (.1).

<p>[Case administration] Email from counsel for investor regarding claims process and timing of Court's consideration of Receiver's proposed Plan (.2); review claim form from investor and coordinate responding to him to explain the status of the claims process and that notice will be provided when the Court approves the process and claim forms (.2); email from counsel for FDIC-R confirming consent to extension of time to file Reply in support of Receiver's Motion to approve claims process and distribution plan, and other administrative matters, and send email to counsel for SEC requesting its consent to the extension of time (.2).</p>	0.60	159.00	KDM
<p>[Case administration] (No charge) Coordinate final revisions to the invoices of counsel or Receiver (.2); begin redacting those invoices for purposes of attaching them to Fee Application (.4); coordinate and review results of calculations of amount and percentage of fees that were reduced and the blended rate</p>	0.80	0.00	KDM

and coordinate inserting those calculations into Fee Application (0.2).

	[Asset analysis and recovery] Work on update to Venezuela counsel regarding Price signed power of attorney.	0.30	79.50	MDV
	[Fee and Employment Application] (No charge) Work on fee application.	2.70	0.00	DMC
Feb-26-14	[Asset analysis and recovery] (KM Homes) Review file related to KM Homes to prepare for mediation.	1.40	371.00	MME
	[Case administration] (No charge) Travel to Atlanta.	2.00	0.00	MME
	[Asset analysis and recovery] Review PFGRE documents and all bank statements related to PFGRE, LLC (0.8); research and draft motion regarding relief related to PFGRE, LLC (4.4).	5.20	1,378.00	GFG
	[Asset analysis and recovery] (KM Homes) Conference with the Receiver in preparation for mediation and review materials relevant for mediation.	1.90	503.50	GFG
	[Asset analysis and recovery] (KM Homes) Review Defendants' Reply in support of Motion to re-open discovery for limited purposes (.1); strategize with team members regarding upcoming mediation and arguments to be asserted based on recently uncovered facts (1.4).	1.50	397.50	KDM
	[Business operations] Coordinate gathering additional documents needed by tax consultant to prepare tax returns for Receivership Entities (.1).	0.10	26.50	KDM
	[Case administration] Email to and from counsel for SEC regarding consent to extension of time to file Reply in support of Motion to approve claims process and distribution plan and coordinate preparation of Motion for extension of time (.2); receive report from forensic accountant regarding	0.40	106.00	KDM

status of outstanding work related to forensic analyses and account reconstruction, and report from tax consultant regarding status of gathering documents necessary for preparation of tax returns for the Receivership Entities (.2).

[Case administration] (No charge) Review and revise Sixth Interim Fee Application, review certain invoices of professionals and work on having them revised, and coordinate further revisions to Fee Application (2.4).	2.40	0.00	KDM
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[Asset analysis and recovery] Search IRS website for form requesting 941 transcript (0.2); Email to Lesley Johnson regarding form (0.1); Fill out transcript request form for Montgomery Asset Management's, PFG's, and PFGBI's 941 forms (0.7); Draft cover letter to IRS regarding 941 transcripts (0.3).	1.30	195.00	AF
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[Fee and Employment Application] (No charge) Revise fee application.	0.40	0.00	DMC
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[Fee and Employment Application] (No charge) Conference regarding invoices and rates for all local counsel and professionals employed by Receiver.	0.50	0.00	DMC
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[Fee and Employment Application] (No charge) Calculate blended rates for all counsel and confer with Receiver's counsel regarding same.	0.80	0.00	DMC
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[Asset analysis and recovery] Prepare mediation binder for attorney G. Giberson's review in preparation for mediation with KM Homes.	2.90	217.50	pl
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Feb-27-14 [Asset analysis and recovery] Prepare for and attend mediation of KM Homes matter.	4.50	1,192.50	MME
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[Case administration] (No charge) Travel return to Miami.	2.00	0.00	MME
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[Asset analysis and recovery] Prepare for mediation with the Receiver and attend	5.90	1,563.50	GFG
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mediation with Receiver (4.0); review file regarding potential discovery issues related to unattained documents and additional depositions in light of failure to settle case (1.9); local travel (0.9 no charge).

[Asset analysis and recovery] (No charge) Ret run travel to Miami.	2.00	0.00	GFG
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[Asset analysis and recovery] Strategize regarding information obtained from Jim Price related A. Price's cooperation with Receiver's efforts to recover assets and the Price's intention to sell their house, whether there is equity in the property, and possible agreement to split any net proceeds if there is equity (.4); discuss agreeing to Protective Life's and Household Life's request for extension of time to file reply in support of Motions to Intervene and to exceed page limitation and review their Motions seeking such relief filed with the Court (.2); review tracking chart for demands to investors with net gains and potential fraudulent transferees and follow up on obtaining responses to our demand letters, coordinate updating the chart to reflect the latest forensic analyses regarding amounts of net gains and fraudulent transfers, strategize regarding persons to be removed from the list of fraudulent transferees based on investigation into transfers, and supervise preparation of remaining letters to fraudulent transferees (.5); emails with counsel for FDIC-R regarding confirmation of agreement for extension of time for FDIC-R to respond to any amended complaint that is filed (.1); review FDIC-R's revised versions of the Partial Settlement Agreement resolving the real property disputes and the revised Assignment Agreements, create compare documents to identify the FDIC-R's latest revisions, and analyze revisions (.6).	1.80	477.00	KDM
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[Asset analysis and recovery] (MCBI action) Review Notice of Leave of Absence filed by counsel for a Defendant and coordinate calendaring dates to exclude from any scheduling (.1).	0.10	26.50	KDM
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	[Asset analysis and recovery] (KM Homes) Review emails with the Court's law clerk regarding the Receiver's consent to the entry order memorializing agreement with Google on subpoena for documents (.1).	0.10	26.50	KDM
	[Case administration] Review and revise Second Agreed Motion for Extension of Time to File Reply to FDIC-R's Objections to Receiver's Plan and proposed Order and coordinate filing with the Court (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Draft cover letters to IRS regarding transcripts for 941 forms for PFG and PFGBI and coordinate mailing to IRS.	0.30	45.00	AF
	[Asset analysis and recovery] Review status of net winner demand letters and responses [0.4]; confer regarding status of potential fraudulent transferee demands [0.2]; review forensic accountant's updated transferee schedule [0.3], and compare with current schedule [0.2].	1.10	165.00	DMC
	[Fee and Employment Application] (No charge) Revise fee application [0.2]; draft proposed order on fee application [0.3]; gather all exhibits to fee application for Receiver's review [0.4].	0.90	0.00	DMC
	[Fee and Employment Application] (No charge) Review forensic accountant's amended invoice [0.2]; revise fee application to include same [0.3].	0.50	0.00	DMC
	[Fee and Employment Application] (No charge) Revise order on fee application to reflect accountant's amended invoice.	0.10	0.00	DMC
	[Asset analysis and recovery] (No charge) Prepare draft of the Second Agreed Motion for Extension of Time to File Reply to FDIC-R's Objections to Receiver's Plan and proposed order for attorney K. Murena's review.	0.40	0.00	pl
Feb-28-14	[Asset analysis and recovery] (No charge) Review fee application.	1.00	0.00	MME

[Case administration] Review and revise motion regarding PFGRE, LLC.	0.80	212.00	MME
[Asset analysis and recovery] Research and draft motion as to PFGRE (2.5); review trial order (.3); research deadlines and review file regarding preparation for trial (1.4).	4.20	1,113.00	GFG
[Asset disposition] Have Receiver review proposed revision to Listing Agreement for the Longboat Key property, reducing the asking price and extending the term of the Agreement, strategize regarding the value of the property and the minimum amount we could sell it for pursuant to the Court's order approving the sale (.3); send executed Agreement to realtor and coordinate updating of listing and marketing the property at new price and exchange emails with realtor regarding Agreement and marketing the property (.2).	0.50	132.50	KDM
[Asset analysis and recovery] Continue investigating transfers allegedly made from investor to PFG for purposes of determining amount of that investor's net gains and exchange emails with counsel for that investor regarding status of investigation and further documentation required to support the alleged transfers (.5); review Orders granting Household Life's and Protective Life's motions for extension of time to file reply in support of their motions to intervene and motions to exceed the page limitation and coordinate calendaring new deadline to file reply (.1); strategize with Receiver regarding recovering assets from Venezuela and Guatemala and need for notarized power of attorney from A. Price granting attorneys in Venezuela the right to pursue his interests abroad (.3); telephone calls to and from FBI regarding A. Price and coordinate further investigation and setting up call with R. Price's counsel (.3); emails with counsel for investor regarding obtaining documents from investor's bank to support a particular transfer he claims to have made to PFG for purposes of resolving Receiver's demand for return of investor's net gains (.2); review Genworth's	1.80	477.00	KDM

motion for extension of time to file Reply in support of Motion to Intervene and order granting motion and coordinate calendaring of new deadline (.2); strategize with Receiver and G. Giberson regarding expanding the receivership to include additional entities owned by Price and strategize regarding preparation of the motion to expand receivership (.2).

[Asset analysis and recovery] (KM Homes) Review Notice of outcome of mediation and request for status conference filed by KM Homes and Clerk's Notice setting trial and discuss with Receiver and G. Giberson mediation, strategy for prosecuting claims, and preparing for trial in light of Defendant's positions and arguments asserted at mediation (.5); review Order granting motion to reopen discovery for limited purposes (.1).	0.60	159.00	KDM
[Case administration] Review Order granting Second Agreed Motion for extension of time to file Reply in support of Receiver's motion to approve claims process and distribution plan and coordinate calendaring of new deadline (.2).	0.20	53.00	KDM
[Asset analysis and recovery] Review forensic accountant's updated schedule of potential fraudulent transferees [0.8]; create spreadsheet for purposes of mass mail out to all fraudulent transferees [1.5]; review and revise letters to such transferees [0.8].	3.10	465.00	DMC
[Asset analysis and recovery] Conference regarding potential investigation of new assets.	0.20	30.00	DMC
[Fee and Employment Application] (No charge) Confer with Receiver regarding invoices [0.1]; revise, finalize, gather, scan and label exhibits for submission to Court (1.0).	1.10	0.00	DMC
[Asset analysis and recovery] Finalize the Second Agreed Motion for Extension of Time to File Reply to FDIC-R's Objections to	0.20	15.00	pl

Receiver's Plan and proposed order and file electronically.

Mar-03-14	[Asset analysis and recovery] Meet with counsel regarding status and strategy of KM Homes litigation.	0.50	132.50	MME
	[Asset analysis and recovery] Review incoming mail from PFG.	0.10	26.50	GFG
	[Asset analysis and recovery] Review order on Google documents and review files regarding Google Mail documents.	0.60	159.00	GFG
	[Asset analysis and recovery] Review email from investor regarding amended complaint, revise and email PFGRE Motion to the Receiver and team members via email.	0.40	106.00	GFG
	[Asset analysis and recovery] (KM Homes) Strategize with Receiver and team members regarding Motion regarding PFGRE (.9); review and revise Motion regarding PFGRE and proposed additional revisions to be made (.4); emails to and from counsel for SEC regarding its consent to Motion (.2); strategize with Receiver and team members regarding future interview with A. Price and subjects to be addressed and send email and make telephone call to criminal counsel to A. Price regarding proposed subjects (.3).	1.80	477.00	KDM
	[Asset analysis and recovery] Strategize regarding witnesses to be interviewed and evidence to be gathered to support the Receiver's claims against MCBI (.3).	0.30	79.50	KDM
	[Case administration] Review Certificates of Consent to Substitution of Counsel for local counsel in N.D. Ga. actions (.1).	0.10	26.50	KDM
	[Case administration] (No charge) Emails to and from counsel for SEC regarding Sixth Interim Fee Application and coordinate filing it with the Court (.2); make final revision to Fee Application and coordinate and assist with filing with the Court (.2).	0.40	0.00	KDM

	[Fee and Employment Application] (No charge) E-mails with real estate counsel regarding revisions to invoice [0.1]; Revise fee application to include updated invoice from real estate counsel [0.3].	0.40	0.00	DMC
Mar-04-14	[Asset analysis and recovery] Meet with counsel regarding KM Homes litigation strategy.	0.70	185.50	MME
	[Asset analysis and recovery] Review email from counsel for FDIC and proposed motion to extend deadlines (0.1); conference with counsel regarding motion to extend case deadlines (0.1); review Stanford case and emails with counsel regarding import (.1).	0.30	79.50	GFG
	[Asset analysis and recovery] (MCBI Action) Revise third amended complaint in MCBI case and distribute to litigation group.	2.70	715.50	GFG
	[Asset analysis and recovery] (KM Homes) Review local rules regarding pre-trial procedures and file regarding same (.3); review case documents and pleadings file for trial exhibits and witnesses (2.3).	2.60	689.00	GFG
	[Asset analysis and recovery] (KM Homes) Receive analysis and strategize regarding transfers between PFGRE and KM Homes for purposes of formulating arguments against KM Homes (.4); meet with Receiver and G. Giberson regarding law applicable to claims and defenses asserted by KM Homes in light of recent evidence uncovered regarding the Receivership Defendants and their assets, and to formulate a strategy for pursuing claims against KM Homes, and strategize regarding possible motion to add a plaintiff to the lawsuit (.5).	0.90	238.50	KDM
	[Asset analysis and recovery] Emails to and from counsel for FDIC regarding latest proposed revisions to the Partial Settlement Agreement resolving real estate disputes and Assignment Agreement, discuss with Receiver FDIC's proposed revisions to those Agreements, and schedule a call with counsel	1.20	318.00	KDM

for the FDIC to resume negotiations regarding these agreements (.4); review recent case law regarding Receiver's power and authority and priorities of claimants and coordinate further research to determine extent of new law (.3); follow up on preparation of demand letters to potential fraudulent transferees, review detailed account reconstruction for additional contact information for certain transferees, and assist with locating contact information (.2); review email from counsel for FDIC-R regarding proposed Joint Motion setting deadlines in action against the FDIC-R in the S.D. Ga., review and approve form of Joint Motion, and coordinate sending to local counsel for review and compliance with local rules (.2); emails with special insurance counsel regarding the status of various insurance related matters and coordinate meeting to formulate strategy for these issues and assign tasks to team members (.1).

	[Asset analysis and recovery] Research regarding statute of limitations in Guatemala	0.50	75.00	AF
	[Asset analysis and recovery] Review detailed transaction report from forensic accountant [0.5]; review address information from known fraudulent transferees [0.3]; work on demand letters to fraudulent transferees [0.5].	1.30	195.00	DMC
	[Asset analysis and recovery] (KM Homes) Review Bank of America documents related to PFGRE and determine the owner of the accounts where transfers were made to and from.	0.50	37.50	pl
Mar-05-14	[Asset analysis and recovery] Emails with counsel for Nelson Mullins and attention to scheduling mediation with selected mediator.	0.20	53.00	GFG
	[Asset analysis and recovery] (KM Homes) Conference with trial counsel regarding background on KM Homes case and trial preparation and review file regarding categories of tasks.	0.40	106.00	GFG

[Asset disposition] Emails to and from counsel for FDIC-R regarding recent appraisal of the Longboat Key property for purposes of marketing that property for sale (.2).	0.20	53.00	KDM
[Asset analysis and recovery] Emails with special insurance counsel regarding status of various insurance-related matters and confirmation of call to discuss the status and divide duties (.1); telephone call with counsel for the FDIC-R regarding proposed revisions to the Partial Settlement Agreement resolving real estate issues with the Receiver and the Assignment Agreement regarding the loan to SCAN (.5); strategize regarding research issue of statute of limitations in foreign countries to recover loan proceeds pursuant to default under note, receive report of preliminary findings, and coordinate further investigation and consultation with the Receiver's South American counsel (.3); email from local counsel in S.D. Ga. regarding expiration of the stay in the action against FDIC-R and deadlines that will become effective and provide update to counsel regarding agreement with counsel for FDIC-R to extended deadlines to amend the complaint and for FDIC-R to respond to amended complaint (.1); begin reviewing draft of Third Amended Complaint against FDIC-R and strategize regarding revisions that were made and further revisions to be made (.5); emails to and from counsel for investor who may have received net gains regarding bank statement evidence funds being transferred from investor's account to account of PFG and information to provide to SunTrust to obtain proof of receipt of funds into PFG's account, review that bank statement, and coordinate providing SunTrust with reference number and background information to facilitate it's confirmation of receipt of funds (.8).	2.30	609.50	KDM
[Asset analysis and recovery] (KM Homes) Continue strategizing regarding motion to add PFGRE as a party plaintiff and the legal authority for such motion (.3).	0.30	79.50	KDM

	[Asset analysis and recovery] Continue research regarding statute of limitations in Guatemala (1.5); Phone call to Alfredo at De Sola Pate & Brown regarding statute of limitations (left message) (0.1); Research regarding collection on loan from guarantors (1.0); Phone call with De Sola Pate & Brown (0.1).	2.70	405.00	AF
	[Fee and Employment Application] (No charge) Work on redaction to invoice.	0.40	0.00	DMC
Mar-06-14	[Asset analysis and recovery] Telephone call with Venezuelan counsel regarding status and strategy.	0.70	185.50	MME
	[Business operations] Review e-mails regarding farm operations and approvals.	0.50	132.50	MME
	[Asset analysis and recovery] KM Homes - Conference regarding claim and defenses.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Review case documents for trial preparation.	1.30	344.50	GFG
	[Asset analysis and recovery] Telephone conference with insurance counsel for the Receiver, Jason Mazer and Matt Baldwin, regarding insurance issues and update.	0.40	106.00	GFG
	[Asset analysis and recovery] Emails and conference with team members regarding interview of Mr. Price.	0.20	53.00	GFG
	[Asset disposition] Telephone call with counsel for FDIC-R regarding the recent appraisal of the Longboat Key property (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Email from criminal counsel for A. Price regarding consent to meeting with A. Price to discuss subjects related to asset recovery and strategize with team members regarding information to be discussed and possible Declaration to request from A. Price (.4); telephone call and emails to and from counsel for FDIC-R regarding proposed Joint Motion	1.70	450.50	KDM

to extend deadline to amend complaint and for FDIC-R to respond to amended complaint in the action against the FDIC-R in the S.D. Ga. and whether the Receiver will amend the complaint (.2); review and revise Joint Motion to extend deadlines, confer with Receiver regarding proposed revisions and agreement to filing of Joint Motion, and send email to counsel for FDIC-R regarding proposed revisions and Receiver's consideration of Joint Motion (.3); teleconference with insurance counsel regarding the status of various matters related to insurance policies and strategy for addressing those matters and protecting the Estate's interests in connection therewith (.4); receive update regarding status of limitations research for recovering assets abroad based on advice of foreign counsel and provide direction for further research (.2); receive report of research findings regarding issue of pursuing claims against guarantors (.2).

	[Asset analysis and recovery] Phone call J. Pate in Venezuela regarding statute of limitations issues.	0.20	30.00	AF
	[Asset analysis and recovery] Continued research regarding collection of note from guarantor.	2.00	300.00	AF
	[Asset analysis and recovery] Work on demand letters to potential fraudulent transferees.	0.40	60.00	DMC
Mar-07-14	[Asset analysis and recovery] Review incoming mail from PFG regarding active projects.	0.10	26.50	GFG
	[Asset analysis and recovery] Review final draft of joint motion on extension of Southern District of Georgia case against FDIC-R.	0.20	53.00	GFG
	[Asset analysis and recovery] (KM Homes) Conferences with team members and the Receiver regarding KM Homes case.	0.50	132.50	GFG
	[Asset analysis and recovery] (KM Homes) Research and continue to drafting motion to add PFGRE as a party Plaintiff in action.	4.90	1,298.50	GFG

[Asset analysis and recovery] (MCBI Action) Revise Third Amended Complaint pursuant to comments of team members and the Receiver and file with attachments.	2.60	689.00	GFG
[Asset analysis and recovery] Confer with Receiver regarding revisions to proposed Joint Motion for extensions of deadlines to amend complaint against FDIC-R in S.D. Ga. action and for FDIC-R to respond to amended complaint and exchange emails with counsel for FDIC-R regarding consent to filing Joint Motion with proposed revisions (.2); email from counsel for FDIC-R regarding proposed Order granting Joint Motion for Extension and review and approve proposed Order (.2); review final version of Motion and proposed Order filed with the Court (.1); telephone call with counsel for R. Price regarding representation of A. Price in SEC enforcement action and receipt of funds or income by A. Price (.2).	0.70	185.50	KDM
[Asset analysis and recovery] (MCBI Action) Strategize and assist with final revisions to Third Amended Complaint against FDIC-R and coordinate finalizing and filing Complaint (.7); review Notice for Leave of Absence filed by counsel for certain Defendants and coordinate noting in calendar (.1).	0.80	212.00	KDM
[Case administration] Review Genworth Life Insurance Company's Objection to Receiver's Sixth Interim Fee Application, seeking deferment of ruling until after insurance companies' claims are finally adjudicated and strategize regarding response arguments and coordinate drafting of response to Objection (.5).	0.50	132.50	KDM
[Asset analysis and recovery] Work on demand letters to fraudulent transferees.	1.90	285.00	DMC
[Asset analysis and recovery] Conference call with John Holt regarding his communications and meetings with reporters and news companies.	0.20	30.00	DMC

	[Case administration] Conference regarding life insurance companies' response to objection to fees.	0.20	30.00	DMC
	[Case administration] Review life insurance companies' objection to fees.	0.70	105.00	DMC
	[Case administration] Review life insurance companies' motion to intervene [0.3]; Review and analyze response to motion to intervene [0.6].	0.90	135.00	DMC
	[Asset analysis and recovery] (MCBI Action) (No charge) Assist attorney G. Giberson in finalizing the Third Amended Complaint and gathering exhibits; file and serve electronically.	1.70	0.00	pl
Mar-09-14	[Asset analysis and recovery] (KM Homes) Research and continue drafting motion to add PFGRE as party plaintiff.	2.90	768.50	GFG
	[Asset analysis and recovery] Emails with local counsel in Georgia regarding update on status of claims against FDIC.	0.10	26.50	GFG
	[Asset analysis and recovery] Email from A. Price's father regarding A. Price being moved to a high security facility and request that he be moved to a lower security facility and strategize regarding upcoming visit with A. Price (.2).	0.20	53.00	KDM
Mar-10-14	[Asset analysis and recovery] (KM Homes) Review and revise motion to add PFGRE LLC.	0.50	132.50	MME
	[Asset analysis and recovery] KM Homes - Work on trial strategy and pretrial conference.	2.00	530.00	PFV
	[Asset analysis and recovery] (KM Homes) Revise motion to add PFGRE as party plaintiff and conference team members and the Receiver regarding draft.	1.80	477.00	GFG
	[Asset analysis and recovery] (KM Homes) Review email from the Court regarding the	0.40	106.00	GFG

pre-trial order and conferences with team members regarding same.

[Asset analysis and recovery] Emails and conference regarding communications with investors.	0.20	53.00	GFG
[Case administration] Work on response to FDIC's objections to distribution plan (1.4).	1.40	371.00	GFG
[Case administration] Review objections by insurance companies to fee application and conference regarding objection.	0.30	79.50	GFG
[Asset analysis and recovery] (KM Homes) Review and revise email to counsel for Defendants requesting consent to adding PFGRE as party plaintiff and strategize preparation of Motion to add PFGRE as party plaintiff (.2); review and revise Motion and coordinate further revisions and additions (1.2); email from Judge's courtroom deputy regarding filing of Pretrial Order and strategize with Receiver and team members regarding preparation of that Order (.3); strategize with trial team regarding various tasks to be performed in preparation for trial (.3).	2.00	530.00	KDM
[Asset analysis and recovery] Email from investor regarding his involvement and investments with A. Price and his interest in assisting Receiver to recovery assets for the benefit of all investors and strategize regarding responding to inquiries of this investor (.2); strategize with Receiver and team members regarding communications on behalf of A. Price by his family members to persons in Venezuela and Guatemala and status of our efforts to recover assets from those countries (.2); work with Receiver on strategy for upcoming meeting with A. Price (.4); telephone call with Jim Price regarding Receiver's upcoming meeting with A. Price in jail, various subjects to be addressed related to asset recovery, his cooperation with Receiver, and his family's communications with persons abroad and reporters (.6); review and finalize	1.90	503.50	KDM

demand letters to various potential fraudulent transferees and coordinate service of letters (.5).

[Business operations] Email from tax consultant regarding additional financial records required to prepare tax returns for Receivership Entities and assist with gathering and generating the requested financial records (.4); review letter and tax form from company in which PFG held assets and forward to tax consultant for purposes of preparation of tax returns (.2).	0.60	159.00	KDM
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[Case administration] Email and telephone calls to counsel for SEC regarding status of receivership, settlement negotiations with FDIC-R, status of action against KM Homes and issues related to trial, and possible abatement of Receiver's motion to approve claims process and distribution plan (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] Conference with team members regarding trial preparation for trial against KM Homes (0.3); Create binder containing pleadings and exhibits (2.2).	2.50	375.00	AF
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[Business operations] Email to and from L. Johnson regarding filing 2013 taxes for receivership entities.	0.20	30.00	AF
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[Asset analysis and recovery] Work on demand letters to fraudulent transferees.	2.40	360.00	DMC
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[Case administration] Review pleadings [0.2]; begin preparing response to insurance companies' objection to Receiver's fee application [0.7].	0.90	135.00	DMC
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Mar-11-14	[Asset analysis and recovery] KM Homes - Conference regarding claims and defenses.	0.50	132.50	PFV
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[Asset analysis and recovery] KM Homes - Conferences regarding Complaint and preparations for trial order.	2.00	530.00	PFV
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[Asset analysis and recovery] (KM Homes) Research and work on trial order (.8); conference with trial counsel regarding strategy in KM Homes case (1.4); revise motion to add PFGRE as party and file with exhibits and serve on opposing counsel via email (2.6); research and draft answer and defenses to recoupment counterclaim (.7).	5.50	1,457.50	GFG
[Asset analysis and recovery] Review mail from PFG for issues related to active projects.	0.10	26.50	GFG
[Asset analysis and recovery] Telephone and emails with counsel for the FDIC, Alan Curley, and telephone conference with S.E.C. counsel and co-counsel regarding update, strategy and consent to abate decision on motion to approve claims process.	1.10	291.50	GFG
[Asset analysis and recovery] (KM Homes) Telephone conference with counsel for KM Homes, George Marcus (.2); telephone conference with Jody Schillechi regarding the pretrial order and emails with the Court's judicial assistant regarding deadline for order (.3).	0.50	132.50	GFG
[Asset analysis and recovery] (KM Homes) Research and draft answer and affirmative defenses to recoupment count in counterclaim in KM Homes matter (1.2); Emails with opposing counsel regarding pretrial order and regarding PFGRE motion. (0.3).	1.50	397.50	GFG
[Asset analysis and recovery] (KM Homes) Review emails with counsel for Defendants regarding refusal to consent to adding PFGRE as a party plaintiff and strategize regarding counsel's position and for call with counsel to further discuss the issue (.3); receive report regarding telephone call with counsel for Defendants regarding settlement and adding PFGRE as party plaintiff and strategize regarding revision to be made to Motion to add PFGRE (.4); review emails with Judge's courtroom deputy regarding the parties' agreement regarding preparation and timing of filing of pretrial order (.1); email from counsel	1.90	503.50	KDM

for SEC regarding witnesses for trial and strategize with team members (.3); review latest forensics regarding transfers between investors and Receivership Entities and strategize regarding potential additional or alternative claims and defendants (.6); strategize with team members regarding preparation of Answer to Counterclaim (.2).

[Asset analysis and recovery] Emails to and from Jim Price regarding upcoming visit with A. Price in jail to discuss asset recovery, notifying the Sheriff's Office of visit, request for large room, status of R. Price's representation by counsel and communications with her, and various other matters, and coordinate informing Sheriff's Office of our upcoming visit (.3); follow up on status of negotiations with former counsel to Receivership defendants and expiration of latest tolling agreement (.1); assist with finalizing additional demand letters to potential fraudulent transferee and review and coordinate updating tracking chart for all demand letters and following up with previously sent demand letters (.3).	0.70	185.50	KDM
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[Case administration] Emails with counsel for SEC regarding various aspects of the receivership and status of pending litigation and coordinate telephone conference to provide more detailed updates to counsel (.2); telephone call with counsel for SEC and G. Giberson regarding status and strategy for KM Homes litigation, status of settlement negotiations with FDIC-R, proposed abatement of Motion to approve claims process and distribution plan pending outcome of settlement negotiations, and response to Genworth's objections to Receiver's Sixth Fee Application (.6); coordinate obtaining FDIC-R's agreement to join in Motion to abate Motion to approve claims process and distribution plan, obtain consent, and strategize regarding preparation of Joint Motion (.2); emails to and from counsel for FDIC-R regarding Partial Settlement Agreement and Assignment Agreement and status of Receiver's consideration of FDIC-R's	1.80	477.00	KDM
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latest revisions (.2); work with team members on strategy for continued negotiations with FDIC-R, narrowing the issues, and identifying the key terms of settlement (.6).

[Asset analysis and recovery] KM Homes: Review pleadings in order to prepare pretrial order (2.0); Conference regarding trial strategy and pretrial order (0.3); Search Pacer for McSwain's deposition and review (1.2); Conference regarding counterclaim for recoupment and strategy (1.0); Conference regarding counterclaim for recoupment and filing answer and affirmative defenses (1.0); Research federal rule of civil procedure regarding time to file answer to counterclaim (0.3).	5.80	870.00	AF
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[Case administration] Research regarding duties of Receiver as fiduciary [0.5]; work on response to life insurance companies' objection to fee application [0.5].	1.00	150.00	DMC
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Mar-12-14	[Asset analysis and recovery] Meet with counsel regarding FDIC agreement regarding property issues, reviewing language and approving.	0.70	185.50	MME
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[Asset analysis and recovery] KM Homes - Conference regarding status and basis for answer and affirmative defenses.	0.60	159.00	PFV
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[Asset analysis and recovery] KM Homes - Review motion to dismiss and perform research regarding defenses related to recoupment client.	0.70	185.50	PFV
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[Asset analysis and recovery] KM Homes - Review and revise answer and affirmative defenses.	0.40	106.00	PFV
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[Asset analysis and recovery] KM Homes - Conference regarding claims and defenses.	0.60	159.00	PFV
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[Asset analysis and recovery] (KM Homes) Conferences with team members and work on	3.90	1,033.50	GFG
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pretrial order with team members (.9);
research and continue to draft trial order (3.0).

[Asset analysis and recovery] (KM Homes) Conferences with counsel regarding answer to counterclaim and revise pursuant to comments of counsel.	1.10	291.50	GFG
[Case administration] Emails with counsel for former law firm regarding mediation.	0.10	26.50	GFG
[Case administration] Review order granting motion for extension of time in S.D. Ga. Action against FDIC-R.	0.10	26.50	GFG
[Asset analysis and recovery] (KM Homes) Strategize regarding Answer to KM Homes' counterclaim (.2); review Notice by KM Homes of Intent to File Response in Opposition to Plaintiff's Motion to Add PFGRE as Party Plaintiff and coordinate calendar of deadline for KM Homes to file that Response (.1); strategize with team members regarding defenses raised by Plaintiff and legal arguments against the defenses (.6).	0.90	238.50	KDM
[Asset analysis and recovery] Review Court's Order granting motion for extension of time to file Amended Complaint and for FDIC-R to file response in Receiver's action against FDIC-R and coordinate calendar of new deadlines (.2); review notice from collection agency regarding debt of A. Price to Branch Bank & Trust, coordinate preparation and sending letter regarding stay of actions against A. Price and forwarding copy of Receivership Order, and coordinate updating of investor/creditor list (.3); review with Receiver latest revisions to Partial Settlement Agreement proposed by counsel for FDIC-R regarding the real property issues, analyze the proposed language and strategize regarding those revisions and effect on the Receiver's ability to pursue claims against guarantors, and division of proceeds of sale of Longboat Key property (.4); continue assisting with locating certain potential fraudulent transferees and	1.10	291.50	KDM

preparation of additional demand letters to them (.2).

[Asset analysis and recovery] Email from and to John Pate regarding contact with the Guatemalan lawyers.	0.20	30.00	AF
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[Asset analysis and recovery] (KM Homes) Draft pretrial order and attachments including voir dire question and questions to determine jurors' legal qualifications.	5.40	810.00	AF
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[Case administration] Work on response to insurance companies' objection to fee application.	0.70	105.00	DMC
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[Asset analysis and recovery] (KM Homes) Assist attorney G. Giberson in revising Answer to Counterclaim in KM Homes action	0.60	45.00	pl
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Mar-13-14	[Asset analysis and recovery] (KM Homes) Review answer to counterclaim (.3).	0.30	79.50	MME
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[Case administration] Review Joint Motion to abate consideration of Receiver's Plan (.3).	0.30	79.50	MME
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[Asset analysis and recovery] KM Homes - Review email regarding equitable legal claims and defenses and conference regarding same.	0.80	212.00	PFV
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[Asset analysis and recovery] (KM Homes) Research counterclaims, conference with counsel regarding filing of Answer in KM Homes and revise pursuant to research and comments from team members and the Receiver, file answer (1.1); emails and conference with team members regarding nature of claim (equitable or legal) and review previous research regarding same issue (.6).	1.70	450.50	GFG
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[Asset analysis and recovery] Review new mail from PFG.	0.10	26.50	GFG
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[Asset analysis and recovery] (KM Homes) Review research regarding jury instructions and work on trial order (.5); work on issues	3.40	901.00	GFG
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related to testimony of Mr. Price (.6); work on issues related to interviews of witnesses (2.3).

[Asset analysis and recovery] (KM Homes) Conferences with trial counsel regarding pretrial order and strategy and revise pre-trial order.	2.80	742.00	GFG
[Asset analysis and recovery] (KM Homes) Conference with KM Homes litigation team (.5); work on pretrial order (.3); research and continue to work on trial order (3.5).	4.30	1,139.50	GFG
[Case administration] Work on Response to Insurance Company's objections to fee application.	0.50	132.50	GFG
[Asset disposition] Email to and from realtor regarding person interested in purchasing certain artwork in the Longboat Key property (.1); telephone calls to and from that interested purchaser (.2); follow up with realtor on latest inquiries from potential purchases of Longboat Key property, confirmation of updating of MLS listing and reduced asking price, and status of marketing efforts (.2).	0.50	132.50	KDM
[Asset analysis and recovery] Telephone calls from potential fraudulent transferees regarding demand letter and nature of transfers from Defendants to transferees and production of documents controverting Receiver's claims (.5); coordinate updating of tracking chart with transferees contact information and initial responses to demand letters (.1); continue working on confirming addresses of potential fraudulent transferees and finalizing additional demand letters to send out (.5); review letter from company in which PFG had invested regarding PFG's investment and coordinate sending letter to that company, forwarding Receivership Order and requesting information and documents related to PFG's investment (.2).	1.30	344.50	KDM
[Asset analysis and recovery] (KM Homes) Coordinate filing of Application for P. Valori to appear pro hac vice and communicate	0.90	238.50	KDM

with local counsel regarding filing Application and filing fee (.1); review final version of Answer to Counterclaim and strategize with team members (.3); strategize with team members regarding various tasks to be done in preparations for trial (.5).

[Business operations] Receive and review tax documents from company in which PFG had previously invested and coordinate sending to tax consultant for purposes of preparing tax returns (.2); receive and review letter from Town of Longboat Key Code Enforcement regarding fine and coordinate determining basis for fine and paying fine as appropriate (.2).	0.40	106.00	KDM
[Case administration] Review and revise Joint Motion to abate court's consideration of Receiver's Motion to approve claims process and distribution plan and send draft to counsel for SEC for consideration (.3); email from counsel for SEC with recommended revisions to Joint Motion and coordinate making those revisions and filing of Motion (.2).	0.50	132.50	KDM
[Asset analysis and recovery] KM Homes: Research regarding recoupment and right to jury trial (1.1); Draft emails regarding analysis of case law on recoupment and right to jury trial and send to P. Valori and G. Giberson (0.5).	1.60	240.00	AF
[Asset analysis and recovery] KM Homes: Continue to draft pretrial order including case outline, calculation of damages, and stipulated facts.	3.60	540.00	AF
[Asset analysis and recovery] (KM Homes)Conference with team members regarding equitable remedies	0.20	30.00	AF
[Asset analysis and recovery] KM Homes: Research regarding money had and received as an equitable remedy.	1.30	195.00	AF
[Case administration] Work on response to life	1.30	195.00	DMC

insurance policy companies' objection to fee application.

[Asset analysis and recovery] (No charge) Assist attorney G. Giberson in finalizing Answer and Defenses to Defendant's Counterclaim in the KM Homes action and file electronically.	0.60	0.00	pl
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[Asset analysis and recovery] Assist attorney A. Fernandez in creating Exhibit List for pretrial order in KM Homes action.	1.00	75.00	pl
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[Asset analysis and recovery] Assist G. Giberson and K. Murena in finalizing Receiver's Agreed Motion for Thirty Day Extension to Reply to FDIC-R's Objections to Receiver's Distribution Plan and send to FDIC-R's counsel for review.	0.70	52.50	pl
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[Asset analysis and recovery] Prepare request for copies to KM Homes regarding subpoena to Google, Inc. for documents.	0.50	37.50	pl
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Mar-14-14 [Case administration] Multiple meetings with counsel regarding KM homes trial preparation.	1.40	371.00	MME
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[Asset analysis and recovery] Conferences regarding trial preparation.	0.80	212.00	PFV
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[Asset analysis and recovery] (KM Homes) Review and revise pretrial filing materials including voir dire questions, summary, and verdict form.	0.80	212.00	PFV
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[Asset analysis and recovery] (KM Homes) Email regarding trial preparation.	0.40	106.00	PFV
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[Asset analysis and recovery] (KM Homes) Work on jury instructions and the effect of equitable claims and defenses on analysis, conferences with team embers regarding research on jury analysis with equitable claims and defenses and research issue (1.8); emails with team members regarding pending items (.1); work on exhibits list, witness list and stipulations (.7); work on timing issues related	3.50	927.50	GFG
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to the testimony of emails with opposing counsel regarding calling Melissa Davis out of order and emails with opposing counsel regarding same (.4); work on outline of presentation of case (.5).

[Asset analysis and recovery] Emails regarding logistical issues regarding distribution plan briefing and pending case in S.D. of Georgia against FDIC-R, emails with Mr. Curley regarding logistical issues for pending motions, review notes regarding potential resolution of cross claims, draft motion for extension of time to FDIC reply in support of pending distribution plan (.4).	0.40	106.00	GFG
[Asset analysis and recovery] (KM Homes) Work on trial brief, case outline, trial order, and other attachments to trial order.	2.90	768.50	GFG
[Asset analysis and recovery] (KM Homes) Strategize with team members regarding witness list for trial and assist with various aspects of preparation of Pretrial Order (.9).	0.90	238.50	KDM
[Asset analysis and recovery] Emails to and from investor regarding status of Court's approval of plan of distribution, deadline to submit proof of claim form, and A. Price's cooperation with the Receiver's efforts to recover assets (.4); telephone calls to and from person who received demand letter for return of potential fraudulent transfers from Defendants regarding his involvement with Defendants (.4); follow up on research into statute of limitations of claim against guarantors of a note in the U.S. and certain foreign jurisdictions and report status to Receiver (.1).	0.90	238.50	KDM
[Asset analysis and recovery] KM Homes: Further research regarding restitution as an equitable remedy (1.0); Draft email regarding case law on restitution as an equitable remedy and send to P. Valori and G. Giberson (0.5).	1.50	225.00	AF
[Asset analysis and recovery] (KM Homes)	0.40	60.00	AF

Continue to draft Pre-trial order including exhibit list and verdict form.

	[Asset analysis and recovery] SCAN: Email from and to Liz Gordillo regarding conflict check.	0.10	15.00	AF
Mar-15-14	[Asset analysis and recovery] Work on interrogatory verdict form and determining issues in light of which issues may or may not be trouble to a jury.	1.70	450.50	PFV
	[Asset analysis and recovery] Work on voir dire questions.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on case outline, multiple emails team members regarding drafts of pretrial order attachments, work on trial brief and pretrial order (cases) and attachments.	4.10	1,086.50	GFG
Mar-16-14	[Asset analysis and recovery] (KM Homes) Review and revise draft report.	0.70	185.50	PFV
	[Asset analysis and recovery] (KM Homes) Review Defendant's proposed report.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise two versions of proposed interrogatory verdict forms.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise voir dire questions.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise issue outline.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding contents of report and attachments.	0.90	238.50	PFV
	[Asset analysis and recovery] (KM Homes) Review case law and Court's order regarding Complaint and Counterclaim.	0.80	212.00	PFV

	[Asset analysis and recovery] (KM Homes) Review Affirmative Defenses and prepare proposed modification to documents.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Telephone conferences with team members regarding pretrial order and attachments, work on jury instructions and other attachments pursuant to comments of team members.	1.90	503.50	GFG
	[Asset analysis and recovery] KM Homes: Draft Jury Instructions for trial.	3.00	450.00	AF
Mar-17-14	[Asset analysis and recovery] (KM Homes) Meet with counsel regarding trial Pretrial Order legal issues, status and strategy (1.5); review and revise pretrial order and draft attachments (1.3).	2.80	742.00	MME
	[Asset analysis and recovery] Prepare for meeting with Aubrey Lee Price.	2.30	609.50	MME
	[Case administration] (No charge) Travel to Stateborough.	3.00	0.00	MME
	[Asset analysis and recovery] (KM Homes) Conference with trial team regarding formation of issues for trial, revisions to joint report and verdict form.	2.00	530.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise verdict form.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Review case law regarding same transaction issues.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Multiple conferences with trail team members regarding pretrial order and revisions to attachments, revise trial brief pursuant to comments of the Receiver and team members, work with team members regarding text of attachments, research cases to include in pretrial brief, emails with opposing counsel regarding status and logistics of revising and submitting pretrial brief and attachments, work	9.20	2,438.00	GFG

on jury instructions with team members, work on stipulations with team members, revise and submit trial brief and pretrial order to opposing counsel (7.4); emails with opposing counsel regarding revisions to pretrial order and objections, research objections issue and need to present exhibits, prepare copies of exhibits for production, emails with opposing counsel regarding pretrial order (1.8).

[Asset analysis and recovery] (KM Homes) Emails with opposing counsel regarding motion to exceed the page limit for reply, conference with counsel regarding same issues.	0.20	53.00	GFG
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[Asset analysis and recovery] (KM Homes) Continue strategizing with team members regarding the Receiver's potential alternative claims against third party and various issues in connection with preparation of Pretrial Order and for trial (.5); strategize with team members regarding need for forensic analysis of transactions to and from K. McSwain for purposes of trial (.3).	0.80	212.00	KDM
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[Asset analysis and recovery] Telephone calls from additional persons who received demand letters for return of potential fraudulent transfers from Defendants and production of documentation to dispute the Receiver's calculations and/or claims to avoid transfers (.5); emails with counsel for insurance companies regarding consent to further enlargement of page limitation for Reply in support of Motions to Intervene (.1); exchange emails with counsel for SEC and counsel for insurance companies regarding consent to extension of time for Receiver to file Reply to insurance companies Objection to Sixth Fee Application and report to Receiver consent provided by all parties (.2); prepare and Motion for Extension of Time for Receiver to File Reply to Insurance Companies' Objection to Fee Application and proposed Order and coordinate filing thereof (.4); gather and review various documents in preparation for in-person interview with Receiver of A. Price	5.60	1,484.00	KDM
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(2.6); work on various logistics for interview of A. Price in jail and arranging for larger room and notary public (.8); strategize with Monitor regarding interview of A. Price and information to be obtained from or confirmed by him (1.0).

[Asset analysis and recovery] (No charge) Travel to Statesboro, GA for in-person interview of A. Price.	3.00	0.00	KDM
[Case administration] Follow up with counsel for SEC on providing consent to revised Motion for Extension of Time to File Reply to FDIC-R's Objections to Receiver's Distribution Plan (.1); finalize Motion for Extension of Time to File Reply to FDIC-R's Objections to Receiver's Distribution Plan and proposed Order and coordinate filing thereof (.2); review Orders granting two Motions for extension of time to file Receiver's Reply briefs, discuss with Receiver and coordinate calendaring new deadlines (.2).	0.50	132.50	KDM
[Asset analysis and recovery] KM Homes: Prepare for meeting with M. Damian, P. Valori, and G. Giberson regarding pretrial order and trial strategy (0.5); Meeting with M. Damian, P. Valori, and G. Giberson regarding the pretrial order and trial strategy (1.4); Revise pretrial order and attachments (2.5).	4.40	660.00	AF
[Asset analysis and recovery] KM Homes: Research regarding agreements as part of same transaction.	0.70	105.00	AF
[Asset analysis and recovery] KM Homes: Revise Verdict Forms (0.3); Conference regarding verdict forms (0.2); Further Revise verdict forms (0.3).	0.80	120.00	AF
[Asset analysis and recovery] Work on demand letters to potential fraudulent transferees.	0.20	30.00	DMC
[Case administration] (Reduced time) Work on response to objection to fee application.	1.20	180.00	DMC

	[Asset analysis and recovery] Prepare proposed order for Receiver's Agreed Motion for Thirty-Day Extension of Time to File Reply to the FDIC-R's Objections to the Distribution Plan for attorney K. Murena's review(.4); Prepare draft Motion for Extension of Time to Reply to the Insurance Companies Objections to the Sixth Interim Fee Application for attorney K. Murena's review (.5) Finalize Proposed order regarding Receiver's agreed motion for extension of time to reply to FDIC-R's objections to the Distribution Plan (.2); Finalize Motion for Extension of Time to Reply to the Insurance Companies Objections to the Sixth Interim Fee Application and file electronically (.2)	1.30	97.50	pl
Mar-18-14	[Asset analysis and recovery] Prepare for and interview Price in jail (4.5); telephone call with counsel regarding Price's interview and expected testimony (.5).	5.00	1,325.00	MME
	[Case administration] (No charge) Return travel to Miami (4.0)	4.00	0.00	MME
	[Asset analysis and recovery] (KM Homes) Review and revise Plaintiff's trial brief.	1.40	371.00	PFV
	[Asset analysis and recovery] (KM Homes) Review correspondence with opposing counsel.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise proposed order.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on preparation of fact list and time line for trial preparation.	0.80	212.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with Guy Giberson regarding recoupment defenses, case strategy, and exhibit list.	0.80	212.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with Melanie Damian regarding status and testimony of Mr. Price.	0.40	106.00	PFV

[Asset analysis and recovery] (KM Homes) Review Defendant's version of the pretrial order and comments, conferences regarding verdict form and voir dire, conferences regarding revisions to attachments, prepare exhibits, prepare deposition designations, conferences with team members regarding trial strategy, emails with opposing counsel regarding final changes to pretrial order (5.7); review changes to pretrial order by Defendants, emails with team members regarding strategy and changes, review new document served by Defendant's counsel, emails with Defendant's counsel regarding revision to exhibit list (1.2).	6.90	1,828.50	GFG
[Asset analysis and recovery] Final preparations for in-person interview with A. Price and strategize with Receiver regarding subjects to be covered (.7); assist Receiver with interview of A. Price, discuss various subjects related to asset recovery, including assets located abroad and funds transferred to third parties potential fraudulent transferees, and information related to Receiver's claims against KM Homes and against MCBI and its former officers and directors (3.5); have A. Price sign Powers of Attorney, and have them notarized, to assist with asset recovery (.2); revise notes from interview with A. Price (.4); discuss with Receiver various matters discussed during interview, information that A. Price provided, and strategize regarding various tasks to be done based on that information for purposes of asset recovery, and information and documents to be provided to A. Price so he may continue to assist with asset recovery (1.5); review emails with Venezuela counsel regarding Powers of Attorney signed by A. Price and scheduling a call with Price, counsel and O. Lwis and discuss with Receiver (.2); provide information obtained during interview with A. Price to team members for purposes of revising certain demand letters to potential fraudulent transferees and coordinate making revisions to those letters (.4).	6.90	1,828.50	KDM

[Asset analysis and recovery] (No charge) Travel from Statesboro, GA to Miami, FL from in-person interview with A. Price.	4.00	0.00	KDM
[Asset analysis and recovery] (KM Homes) Review analysis of transfers involving KM Homes and K. McSwain prepared by forensic accountant and strategize with team members for purposes of trial preparation (.4); discuss with team members the status of the preparation of the Pretrial Order and Defendants' counsel' review of and revision to latest draft and final revisions to be made (.2); begin reviewing final version of the Pretrial Order filed with the Court (.5); review Defendants' Motion for extension of time to object to exhibits with brief in support and strategize regarding exhibits to which Defendants will object (.2); review updated list of tasks to be done in preparation for trial (.1); discuss with Receiver having A. Price appear as witness for trial and procedure and logistics involved (.2).	1.60	424.00	KDM
[Asset analysis and recovery] KM Homes: Revise case outline for pretrial order (0.3); format trial brief and attach to pretrial order (0.3). Coordinate with J. Serna regarding formatting entire pretrial order and compiling plaintiff's and defendant's attachments (0.2); Draft version of pretrial without defendant's comments (0.6).	1.40	210.00	AF
[Asset analysis and recovery] (KM Homes) Conference with team members regarding the proposed pretrial order and the stipulated facts.	0.40	60.00	AF
[Asset analysis and recovery] Conference with P. Valori and G. Giberson regarding trial strategy and creating schedule of assignments to be completed prior to trial.	0.70	105.00	AF
[Asset analysis and recovery] Work on demand letters to potential fraudulent transferees.	1.70	255.00	DMC
[Asset analysis and recovery] Revise response to objection to fee application	0.50	75.00	DMC

	[Asset analysis and recovery] Assist attorney G. Giberson in finalizing attachments to Pretrial Order in preparation for upcoming trial in the KM Homes matter.	1.50	112.50	pl
Mar-19-14	[Asset analysis and recovery] (KM Homes) Review filing regarding deposition designations and exhibits in KM Homes litigation and responding regarding same.	0.30	79.50	MME
	[Asset analysis and recovery] (KM Homes) Review motion of KM Homes regarding designation and objections and conference with team members regarding same.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Review Roberts designation and prepare email regarding same.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Review Defendant's motion for extension of time regarding only Defendant's pretrial deadlines, telephone conference regarding strategy and response (.3); attention to preparation of trial subpoenas (.3); research pretrial deadlines issues and designations of deposition testimony (.4); conferences regarding strategy, draft email to opposing counsel regarding designation of testimony, review the Court's order on Defendant's request for new deadlines, conferences regarding strategy, further emails with opposing counsel regarding opposition to motion to extend deadlines universally regarding pretrial procedures and on trial exhibits, draft motion on objections deadlines and other pretrial issues, revise pursuant to comments of team members revised motion and pretrial order and file (5.3).	6.30	1,669.50	GFG
	[Asset analysis and recovery] Review documents regarding claims relevant to information that could be provided by Mr. Price and prepare for interview (2.9); telephone conference with Jim Price (.3); research in preparation for interview of Mr. Price (1.1).	4.30	1,139.50	GFG

<p>[Asset analysis and recovery] Communications with Venezuela counsel regarding need to have signed and notarized Powers of Attorney Apostilled in Georgia and coordinate having that done prior to sending to Venezuela counsel and report status to Receiver (.3); continue working on revising demand letters to potential fraudulent transferees based on information provided by A. Price during in-person interview and sign and coordinate sending out certain letters (.4); exchange emails with Jim Price regarding signing up to receive telephone calls from A. Price, A. Price's review and comments on Receivers' latest Status Report, information in support of Receiver's claims against certain potential fraudulent transferees and borrowers of Receivership Entities and coordinate preparation of demand letter to one particular borrower, and various documents to be sent to A. Price so that he can assist with various aspects of the Receiver's asset recovery (.3); coordinate and provide necessary information for signing up to receive telephone calls from A. Price in jail (.2); continue gathering and coordinate saving to disk various documents to be sent to A. Price so he can assist in Receiver's efforts to recover assets (.8); review notes from interview of A. Price and coordinate updating of Investors and potential fraudulent transferee lists and tracking charts for demand letters with information provided by A. Price (.4); work on coordinating call with A. Price, O. Lwis, Venezuela counsel and Receiver (.2).</p>	2.60	689.00	KDM
<p>[Asset analysis and recovery] (KM Homes) Assist with locating various documents to be introduced as Exhibits at trial (1.2); review Order granting KM Homes extension of time to object to exhibits and to designate deposition testimony of Receiver and coordinate calendaring new deadline (.1).</p>	1.30	344.50	KDM
<p>[Asset analysis and recovery] KM Homes: Draft schedule/timeline of documents and assignments that need to be completed prior to trial and send to trial team.</p>	0.50	75.00	AF

	[Asset analysis and recovery] (KM Homes) Review Motion for Extension of time to object to exhibits and to designate portions of depositions submitted by Defendant (0.2); Review local rules on filing objections and impeachment depositions (0.2); Call to G. Giberson to discuss Motion for Extension of Time and local rules (0.1)	0.50	75.00	AF
	[Asset analysis and recovery] KM Homes: Continue to draft and make changes to jury instructions.	2.40	360.00	AF
	[Asset analysis and recovery] KM Homes: Draft Motion for Extension of Time and Proposed Order.	1.80	270.00	AF
	[Asset analysis and recovery] Work on demand letters and prepare spreadsheets to use as corresponding exhibits to submit to potential fraudulent transferees.	1.30	195.00	DMC
	[Asset analysis and recovery] (Reduced time) Revise demand letter to potential fraudulent transferees [0.9]; finalize letters to transferees and gather corresponding exhibits[0.2].	0.50	75.00	DMC
	[Asset analysis and recovery] Prepare exhibits in preparation of upcoming trial in the KM Homes matter.	4.00	300.00	pl
	[Asset analysis and recovery] Telephone call to the Secretary of State regarding procedure to apostille Power of Attorney signed by Aubrey Lee Price.	0.30	22.50	pl
	[Asset analysis and recovery] Copy AUSA documents to disc and send to A. L. Price.	0.50	37.50	pl
Mar-20-14	[Asset analysis and recovery] (KM Homes) Review motions regarding deposition designations and exhibits in KM Homes litigation.	0.30	79.50	MME
	[Asset analysis and recovery] (KM Homes) Conference regarding exhibits for trial,	0.50	132.50	PFV

subpoena for McSwain tax returns and trial preparations.

[Asset analysis and recovery] Conference with Guy Giberson regarding KM Homes loan application.	0.20	53.00	PFV
[Asset analysis and recovery] Review email from investor regarding proof that KM Homes was the borrower.	0.10	26.50	PFV
[Asset analysis and recovery] (KM Homes) Review email from Mr. Leach.	0.10	26.50	PFV
[Asset analysis and recovery] (KM Homes) Review local rules and order.	0.20	53.00	PFV
[Asset analysis and recovery] (KM Homes) Draft response to Mr. Leach.	0.10	26.50	PFV
[Asset analysis and recovery] (KM Homes) Telephone conferences and emails with team members regarding research needed for trial issues, communications with investors regarding information about KM Homes loans and immediate aftermath of Price disappearance, telephone conferences and emails with team members regarding pretrial issues and strategy.	1.70	450.50	GFG
[Asset disposition] Telephone calls to and from realty company in Longboat Key regarding offer to purchase map on wall of Longboat Key property (.2); emails to and from realtor regarding pictures of map on wall of Longboat Key property and estimate of its value (.2); request from realtor report of status of market efforts for Longboat Key property since listing was revised and asking price was reduced (.1).	0.50	132.50	KDM
[Asset analysis and recovery] Continue working on setting up account to receive telephone calls from A. Price and review and exchange emails with online company regarding account setup and coordinate providing additional information and	1.00	265.00	KDM

finalizing account setup (.6); coordinate communications with A. Price through his father to confirm his ability to call our office now that account has been set up (.2); exchange emails with Venezuela counsel regarding arranging for call with O. Lwis and A. Price (.2).

[Asset analysis and recovery] KM Homes: Continue to draft jury instructions.	3.30	495.00	AF
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[Asset analysis and recovery] KM Homes: Research regarding authentication of documents for trial.	1.90	285.00	AF
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[Asset analysis and recovery] KM Homes: Assist in drafting subpoenas for trial witnesses.	0.50	75.00	AF
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[Asset analysis and recovery] KM Homes: Review and print out rules regarding objections to exhibits and strategize for trial.	0.60	90.00	AF
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[Asset analysis and recovery] Review information regarding transfers to A & D Hospitality and Adam Van Nus from receivership entities [0.4]; work on demand letters to such transferees [0.5].	0.90	135.00	DMC
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[Asset analysis and recovery] (Reduced time) Work on response to insurance companies' objection to fee application.	1.00	150.00	DMC
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[Asset analysis and recovery] Continue to gather exhibits for the KM Homes trial.	0.50	37.50	pl
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Mar-21-14	[Asset analysis and recovery] Review filing regarding deposition designations and exhibits in KM Homes litigation and respond regarding same (.3); review exhibits and meet with counsel regarding trial strategy (1.2).	1.50	397.50	MME
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[Asset analysis and recovery] Emails and telephone calls to and from counsel or FDIC-R regarding Receiver's consideration of and consent to FDIC-R's latest revisions to Partial Settlement Agreement and coordinate a call to	0.50	132.50	KDM
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discuss the details (.3); emails from Receiver and from company interested in purchasing Estate's interest in claim against Peregrine Financial's bankruptcy estate and make telephone call to representative of the interested company (.2).

[Asset analysis and recovery] (KM Homes) Review recent Court filings, including Order granting Application for P. Valori to appear pro hac vice and coordinate obtaining CM/ECF username and password for P. Valori (.2); review invoice from mediator and coordinate confirmation of amount due, split with KM Homes, and payment of our portion of amount due (.1); review Motion to Allow Plaintiff to Submit Deposition Designation of Defendant's Corporate Representative and to Object to Defendant's Exhibits Three Days Following Defendant's Production of Exhibits (.2).	0.50	132.50	KDM
[Asset analysis and recovery] KM Homes: Research regarding receiver authenticating documents of company that has been taken over.	1.20	180.00	AF
[Asset analysis and recovery] KM Homes: Review local rule regarding replying to response to motion (0.1); Conference regarding reply to Defendant's objection to our motion for extension of time (0.2).	0.30	45.00	AF
[Asset analysis and recovery] KM Homes: Research regarding using summary as evidence and subpoena to a party for documents.	1.40	210.00	AF
[Asset analysis and recovery] KM Homes: Conference regarding using summary as evidence (0.2); Draft email to opposing counsel regarding using summary (0.2).	0.40	60.00	AF
[Asset analysis and recovery] Work on demand letter to A & D Hospitality.	0.30	45.00	DMC
[Case administration] Revise response to objection to fee application.	0.30	45.00	DMC

	[Asset analysis and recovery] Continue working on exhibits for the KM Homes trial.	4.00	300.00	pl
	[Asset analysis and recovery] Prepare Trial Subpoenas for various witnesses and calculate mileage for witness fees for attorney P. Valori's review prior to having them served.	1.20	90.00	pl
Mar-22-14	[Asset analysis and recovery] (KM Homes) (No charge) Review Motion to Permit late filing with multiple exhibits and emails with counsel.	0.40	0.00	GFG
Mar-23-14	[Asset analysis and recovery] (KM Homes) (No charge) Review KM Homes' Motion to Permit Late Filing of objection to Plaintiff's trial exhibits and to supplement Paragraph 20 of Pretrial Order due to Extraordinary Circumstances and Exhibits thereto and proposed Order (.2).	0.20	0.00	KDM
Mar-24-14	[Asset analysis and recovery] (KM Homes) Telephone conference with counsel regarding status and strategy.	1.00	265.00	MME
	[Asset analysis and recovery] (KM Homes) Conferences regarding trial preparation and review and revise deadline schedule for same.	0.90	238.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding research in opposition to Motion to strike.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Review Defendant's motion for additional extension and conferences regarding same.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Review portions of Defendant's objections to Plaintiff's exhibits.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Additional conference regarding case strategy.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Conferences with team members regarding trial strategy (1.0); research and work on	4.70	1,245.50	GFG

motion in limine (1.3); work on exhibits (1.1); work on trial proof summary and witness summaries (1.3).

<p>[Asset analysis and recovery] (KM Homes) Strategize with team members regarding various aspects of trial preparation, including witnesses to be called and exhibits to be introduced, and objections of Defendant (.9); exchange emails and/or telephone calls with FBI and AUSA regarding having A. Price testify as witness at trial and conduct research to confirm appropriate method for ensuring his appearance and testimony at trial (1.2); conduct research regarding Petition for Writ of Habeas Corpus and procedure for obtaining writ from court and serving it on US Marshall Service to have it executed and witness brought to trial to testify (1.3); begin working on Petition for Writ of Habeas Corpus (.6); review Response to Defendant's Motion to Permit Late Filing Due to Extraordinary Circumstances and strategize regarding effect of Court's granting of relief sought (.2); review Defendant's Response to Plaintiff's Motion to Designate Portions of Party Depositions and for Extension of Time to Submit Objections to Defendant's and Exhibits including proposed Order and strategize with team members (.2); review Plaintiff's Reply in Support of Motion for Extension of Time to Submit Objections to Defendant's Exhibits (.1); review Defendant's Motion to Strike Plaintiff's Answer and Defenses to Defendant's Counterclaim and to Treat Allegations of Counterclaim as Admitted for Purposes of Trial, coordinate calendaring of response deadline, and strategize with team members regarding response arguments (.9).</p>	5.40	1,431.00	KDM
<p>[Asset analysis and recovery] Follow-up telephone call to representative of company interested in purchasing Estate's claim against Peregrine Financial's bankruptcy estate, discuss information and documents that company will need before it can make offer to purchase claim, and report status of inquiry to Receiver (.3); email from another party interested in purchasing Estate's claim and</p>	1.10	291.50	KDM

respond to inquiry (.2); email regarding A. Price's investment in another company now in bankruptcy and coordinate investigation into A. Price's investment and possible value of claim (.2); telephone calls to and from counsel for potential fraudulent transferee regarding documents underlying transfers, dates of the transfers and additional time required to gather and produce records disputing fraudulent transfer claim (.4).

	[Asset analysis and recovery] KM Homes: Research regarding pleading requirements and specificity.	1.80	270.00	AF
	[Asset analysis and recovery] KM Homes: Update schedule for things that need to be completed before trial and circulate to trial team.	0.20	30.00	AF
	[Asset analysis and recovery] Draft response to motion to strike Plaintiff's Answer.	0.90	135.00	AF
	[Asset analysis and recovery] Assist with tax documentation requests to IRS.	0.10	15.00	DMC
Mar-25-14	[Asset analysis and recovery] (KM Homes) Review and revise response to motion to strike (.4); telephone call with counsel regarding status and strategy (.3); receipt and review court order on pre trial order (.1).	0.70	185.50	MME
	[Asset analysis and recovery] (KM Homes) Review and revise opposition to motion to strike answer and affirmative defenses and conference regarding same.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise Motion to excuse local counsel.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding trial preparation including run down of assignments, prepare for impeachment of witnesses and preparation of trial research notebook.	0.70	185.50	PFV

[Asset analysis and recovery] (KM Homes) Review order and sections of rules and order cited by the Court.	0.30	79.50	PFV
[Asset analysis and recovery] (KM Homes) Review order in KM Homes case on outstanding deadlines motions (0.5); conferences and telephone conferences with team members regarding strategy (3.3).	3.80	1,007.00	GFG
[Asset analysis and recovery] Work on response to insurance companies' objections to fee application.	1.50	397.50	GFG
[Asset analysis and recovery] Review notices from IRS regarding requests for certain tax filings revealing income of Receivership Entities filing as partnerships and receive report from A. Fernandez regarding status of obtaining necessary records to determine if Estate is entitled to tax refund (.2); emails with counsel for FDIC-R regarding Partial Settlement Agreement and finalizing the terms (.3); telephone call from counsel for net winning investor regarding possible terms of settlement of Receiver's fraudulent transfer claim and evidence of insolvency and fraud perpetrated by the Receivership Defendants, and the date the insolvency or fraud commenced (.5); emails with Jim Price regarding setting up call with A. Price and O. Lwis and having A. Price call our office to confirm ability to call from jail and to discuss certain issues to be addressed during call with O. Lwis (.2); receive report from D. Carnright regarding communications with one of the companies interested in purchasing claim against Peregrine Financial's bankruptcy estate and information they require to make formal offer to purchase claim (.2); receive update regarding efforts to identify another company in which Defendants may have invested (.1); email from Venezuela counsel regarding upcoming call with A. Price and O. Lwis and scheduling strategy session prior to call to address various issues (.1).	1.60	424.00	KDM
[Asset analysis and recovery] (KM Homes)	0.50	132.50	KDM

Review Order granting Motion for Misc. Relief and directing the parties to resolve disputes related to Pretrial Order and file a revised Pretrial Order incorporating those resolutions by a date certain and coordinate calendaring of that deadline (.2); review Defendant's Response in Opposition to Receiver's Motion to Add Party Plaintiff and strategize with team members regarding arguments raised and responding thereto (.3).

[Case administration] Follow up on preparation of Reply to Insurance Companies' Objection to Sixth Fee Application and strategize regarding final revisions to be made (.2).	0.20	53.00	KDM
[Asset analysis and recovery] KM Homes: Draft Response to Defendant's Motion to Strike Plaintiff's Answer and Affirmative Defenses (3.3); Revise Response to Defendant's Motion to Strike (1.0); Email Response and Proposed order to trial team (0.1)	4.40	660.00	AF
[Asset analysis and recovery] KM Homes: Draft Motion to Excuse Local Counsel and Proposed Order (1.0); Revise Motion to Excuse local counsel and send to trial team for approval (0.2).	1.20	180.00	AF
[Asset analysis and recovery] KM Homes: Research regarding contradictory verdict forms (1.0); continue research regarding receiver authenticating business records (0.9); Research regarding impeachment by deposition (1.8).	3.70	555.00	AF
[Asset analysis and recovery] KM Homes: Review Melanie Damian's Deposition Transcripts and highlight portion that Defendant designated for trial.	1.00	150.00	AF
[Asset analysis and recovery] Investigate PFG's possible investment in Bitcoin [0.2]; draft correspondence to Bowery Investment management regarding offer to purchase of potential claim against Bitcoin [0.2].	0.40	60.00	DMC

	[Asset analysis and recovery] Phone call with B. Max regarding offer to purchase of claims in bankruptcy restructuring cases.	0.20	30.00	DMC
	[Asset analysis and recovery] E-mails with B. Max regarding amount PFG's potential claim in bankruptcy case.	0.20	30.00	DMC
	[Asset analysis and recovery] Review documentation in support of claims against potential fraudulent transferees Anfe Woodrum and A & D Hospitality.	0.50	75.00	DMC
	[Fee and Employment Application] (No charge) E-mails with real estate counsel regarding status of fee application and objection.	0.20	0.00	DMC
Mar-26-14	[Case administration] (No charge) Review and revise response to objections by life insurance company.	0.50	0.00	MME
	[Asset analysis and recovery] (KM Homes) Conference regarding equitable defense regarding pro rata distribution.	0.20	53.00	PFV
	[Asset analysis and recovery] Conference regarding formulating outline regarding McSwain's inconsistent federal claims.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding McSwain's outline questions regarding assignment of claims, jointly.	0.10	26.50	PFV
	[Asset analysis and recovery] Review email regarding pro rata equitable defenses and prepare response regarding same.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding trial subpoenas regarding accountants.	0.10	26.50	PFV

[Asset analysis and recovery] (KM Homes) Email regarding damages claim and application of equitable defenses regarding McSwain's accounting.	0.30	79.50	PFV
[Asset analysis and recovery] (KM Homes) Review email regarding pending motions.	0.20	53.00	PFV
[Asset analysis and recovery] (KM Homes) Conference regarding pro rata equitable defenses and proof in support thereof.	0.40	106.00	PFV
[Asset analysis and recovery] (KM Homes) Telephone conferences with team members regarding strategy and research on motion in limine issues and structure of motion in limine.	0.80	212.00	GFG
[Asset analysis and recovery] Email from Jim Price regarding confirming that A. Price will be able to call us from jail (.1); review letter from A. Price regarding the Receiver's efforts to recover assets and the assistance he can and will provide along with information related to Montgomery Bank and Trust (.2); email and telephone call to counsel for FDIC-R regarding finalizing the Partial Settlement Agreement resolving all real estate issues and providing for Assignment of loan documents to Receiver (.2); telephone call from potential fraudulent transferee who received demand letter for return of amounts transferred from Defendants to him (.1); follow up on obtaining Apostile of notarized Power of Attorney of A. Price and receive report regarding communications with government officials (.1).	0.70	185.50	KDM
[Asset analysis and recovery] (KM Homes) Review Response in Opposition to Motion to Strike Answer to Counterclaim and proposed Order and discuss arguments raised therein with team members (.3); review Defendant's Objection to Plaintiff's Motion to Add PFGRE as Party Plaintiff and strategize with team members regarding response thereto (.8); strategize with team members regarding jury instructions, review forensic analyses related to loans to Defendant and transfers to and from	2.60	689.00	KDM

K. McSwain, and provide assessment for purposes of jury instruction (1.5).

	[Case administration] Review Court's Corrected Order Granting extension of time to file Reply to Insurance Companies' Objection to Sixth Fee Application (.1); emails with Receiver and team members regarding draft of Reply Brief and review and revise draft of Reply Brief and work with team members on making further revisions (1.3).	1.40	371.00	KDM
	[Asset analysis and recovery] Review correspondence from Aubrey Price.	0.10	15.00	DMC
Mar-27-14	[Case administration] Review and revise response to fee application objection.	0.60	159.00	MME
	[Asset analysis and recovery] (KM Homes) Conference regarding equitable defenses and evidence of support for same.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Draft email to Melanie Damian regarding equitable defense.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Prepare email regarding objection to deposition of Ms. Damian.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Review writ of habeas corpus for Price's appearance at trial and conference with team members regarding same.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding witness summaries.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding use of affidavit of Mr. Roberts.	0.20	53.00	PFV
	[Case administration] Review and revise opposition to insurance company's objection to fee application and confer with team member regarding same.	0.40	106.00	PFV

[Case administration] (Reduced time) Research and continue to draft response to Insurance Company objections to fee application.	6.50	1,722.50	GFG
[Asset analysis and recovery] (KM Homes) Continue working on preparing Petition for Writ of Habeas Corpus Ad Testificandum and the actual Writ for purposes of having A. Price testify at trial (.6); strategize with team members regarding A. Price's physical appearance and attire at trial, procedures and logistics of transport to and detention by U.S. Marshals Service in Atlanta, and testimony to be provided and documents to be authenticated, and revise Petition and Writ (1.2); work on communicating with Judge's chambers regarding A. Price's physical appearance and attire at trial (.3); telephone calls and emails to Assistant U.S. Attorneys prosecuting action against A. Price in S.D. Ga. to obtain consent to Writ of Habeas Corpus and transport of A. Price to testify at trial, and send draft of Petition and Writ for their consideration (.5); coordinate and strategize regarding telephone calls to U.S. Marshals Service in N.D. Ga. and S.D. Ga. to discuss prospective issuance of Writ of Habeas Corpus to and discuss various procedures and logistics of transport and detention of A. Price (.3); continue to strategize with team members regarding jury instruction for certain claims and defenses (.3).	3.20	848.00	KDM
[Asset analysis and recovery] Emails with counsel for FDIC-R regarding rescheduling call to discuss final revisions to Partial Settlement Agreement resolving all real estate and related issues (.1); strategize with team members regarding Amended Complaint against FDIC-R (.3); follow up on status of settlement negotiations with counsel for FDIC-R (.1); telephone calls from persons who received demand letters for return of fraudulent transfers or net gains, respond to inquiries and explain nature of claims, obtain information necessary to confirm identity and delete them from the list if application, and coordinate updating of tracking chart (.5);	1.30	344.50	KDM

follow up with Jim Price on having him confirm that A. Price can make call to Receiver's office for purposes of call with O. Lwis and Venezuela counsel (.1); work on confirming with Securus that Receiver's account was set up property and that A. Price will be able to call Receiver from jail (.2) .

	[Business operations] Confer with Receiver regarding certain expenses of the Receivership Estate, review the Receivership Order for specific directions regarding particular types of expenses, and provide summary and recommendation to Receiver (.2).	0.20	53.00	KDM
	[Case administration] review and make final revisions to draft of Reply to Insurance Companies' Objection to our Sixth Fee Application and assist with filing with the Court (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Review response to demand letter to potential fraudulent transferee.	0.10	15.00	DMC
	[Asset analysis and recovery] Update the tracking list for demand letter to fraudulent transferees to reflect calls we have received from various recipients of demand letter.	1.50	112.50	pl
Mar-28-14	[Asset analysis and recovery] Telephone call with Venezuelan counsel regarding offers on Farm and related issues.	0.30	79.50	MME
	[Case administration] Meet with counsel regarding status and strategy.	0.40	106.00	MME
	[Asset analysis and recovery] (KM Homes) Research and draft Motion in Limine (5.0); conferences with team members regarding strategy and structure of Motion (0.2) draft trial outlines (1.0).	6.20	1,643.00	GFG
	[Case administration] Telephone conference with counsel for the FDIC, Al Curley, regarding resolution of cross claims (.5).	0.50	132.50	GFG

[Asset analysis and recovery] Emails with Securus regarding prepayment required for online account to permit A. Price to call Receiver's office, and required change in account settings including password and coordinate funding the account and making required changes to account (.2); follow up on execution of revised Tolling Agreement extending the deadline to bring claim against Nelson Mullins, review fully executed Agreement and coordinate calendaring of new deadline and reminders for that deadline (.3); strategize with team members regarding mediation with Nelson Mullins, receive update regarding scheduling of mediation, and review emails with its counsel (.3); strategize with Receiver regarding upcoming call with O. Lwis and A. Price and issues raised by Venezuela counsel (.2); telephone call with Venezuela counsel regarding upcoming call with O. Lwis and A. Price, issues to be addressed with O. Lwis and proposed settlement terms, latest offer for purchase of farm, information obtained from A. Price during our last meeting, Powers of Attorney signed and notarized, and related matters (.4); send signed and notarized Powers of Attorney to Venezuela counsel (.1); review case law regarding fraudulent transfer claim for return of commissions paid to brokers in Ponzi scheme for purposes of call to former brokers for Defendants (.8); receive report from G. Giberson regarding latest negotiations with counsel for FDIC and possible terms of settlement and strategize regarding formulating framework for settlement that will be agreeable to all parties (.7).	3.00	795.00	KDM
[Asset analysis and recovery] (KM Homes) Emails and telephone calls to and from AUSA regarding inability to consent to issuance of Writ of Habeas Corpus based on the status of the criminal case and the pending Plea Agreement with A. Price (.5); strategize with team members regarding AUSA's position, communications with Jim Price and criminal counsel for A. Price regarding his consideration of Plea Agreement, and arranging for sworn testimony of A. Price to	1.90	503.50	KDM

be taken in jail (.7); exchange emails and telephone calls with team members to strategize regarding trial deposition of A. Price in jail in light of AUSA's refusal to consent to Writ of Habeas Corpus, status of his Plea Agreement in criminal case and issues of impeachment at trial, and work on establishing his unavailability to ensure his inadmissibility at trial (.7).

Mar-29-14	[Asset analysis and recovery] (KM Homes) Email regarding A.U.S.A. position regarding Price writ of habeas corpus for trial.	0.30	79.50	PFV
Mar-30-14	[Asset analysis and recovery] (KM Homes) Research and continue to draft Motion in Limine.	3.50	927.50	GFG
Mar-31-14	[Asset analysis and recovery] (KM Homes) Conference regarding Motion in Limine issues regarding evidence of Ponzi scheme.	0.20	53.00	PFV
	[Asset analysis and recovery] Review order on FDIC motion and telephone conference with team member regarding proposals on the table.	0.20	53.00	GFG
	[Asset analysis and recovery] (KM Homes) Research and revise Motion in Limine (2.0); conferences with team member regarding strategy (0.5).	2.50	662.50	GFG
	[Case administration] Telephone conferences with counsel for FDIC regarding potential resolution of claims issues, attention to logistical issues related to FDIC claims, review order on motion regarding claims process, emails regarding submission to the Court of that issues, conference with team member regarding global resolution of FDIC issues.	2.60	689.00	GFG
	[Asset analysis and recovery] (KM Homes) Assist with formulating and supporting arguments for Motion in Limine to exclude certain testimony and references to A. Price's past conduct (.6); strategize with team members regarding obtaining confirmation from AUSA of inability to consent to Writ of	1.30	344.50	KDM

Habeas Corpus to transfer A. Price to Atlanta for trial, connection to status of A. Price's Plea Agreement with AUSA, and scheduling of trial deposition of A. Price to be taken at jail (.3); work on coordinating trial deposition by contacting jail to obtain available dates and reserve large room to accommodate likely participants (.4).

[Asset analysis and recovery] Receive letter and copy of identification of person who received demand letter for return of fraudulent transfers who claims to have had no involvement with Defendants and coordinate sending letter and identification to A. Price to confirm those claims (.2); telephone call with A. Price regarding various subjects related to asset recovery, claims of certain investors, claims against certain potential fraudulent transferees, claim against Peregrine Financial, bank accounts of certain affiliates of Receivership Entities, and upcoming call with O. Lwis and Venezuela counsel (.3); strategize with team members regarding information provided by A. Price in support of actions against third parties documents that A. Price has requested related to certain investor's claimed investments with PFG (.6); work on locating and gathering additional documents to send to A. Price for analysis to assist with prosecuting claims against certain third parties (1.1); multiple emails with Venezuela counsel regarding preparing for call with A. Price and O. Lwis, agenda for the call, and coordinate setting up conference call (.4); telephone call with Venezuela counsel regarding strategy and subjects to be addressed during call with A. Price and O. Lwis and logistics for coordinating the conference call for various participants and exchange emails regarding call-in information (.6); continue reviewing and analyzing insolvency and Ponzi/fraud analysis prepared by forensic accountant and documents supporting that analysis and for purposes of negotiations with potential fraudulent transferees and investors who realized net gains (1.7).	4.90	1,298.50	KDM
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	[Case administration] Receive report from G. Giberson regarding FDIC-R's consent to further extension of time to file Amended Complaint in action against FDIC-R in S.D. Ga. and summarizing the FDIC-R's proposed framework for a global settlement (.3); review and approve latest Agreed Motion for extension of time to file Amended Complaint and proposed Order, coordinate sending to counsel for FDIC-R for approval, and filing with the Court (.2); prepare and send to Receiver and team members summary of status of settlement agreement and assignment agreement resolving real estate disputes with the FDIC-R (.2); follow up with counsel for FDIC-R regarding finalizing the Partial Settlement Agreement and Assignment Agreement (.2); review Notice from Court regarding submission to the Court for consideration the Receiver's Motion to approve plan for claims administration and distribution, exchange emails with counsel for FDIC-R regarding contacting Court to remind it of extension of time to file Reply Brief while the parties continue settlement negotiations, coordinate contacting Judge's chambers, receive report regarding Court's abating ruling on motion until Reply Brief is filed, and coordinate informing counsel for FDIC-R of communication with chambers (.3); review Order granting Motion for extension of time to file amended complaint in action against FDIC-R in S.D. Ga. and coordinate calendaring of new deadline (.1).	1.30	344.50	KDM
	[Asset analysis and recovery] Review documents regarding PFG LLCs possible ownership of shares of United States Commodity Funds LLC.	0.20	30.00	DMC
Apr-01-14	[Asset analysis and recovery] Multiple telephone calls with Lee Price, Osama Lewis and Venezuelan attorneys regarding Venezuelan assets (1.0); telephone call with Venezuelan attorneys regarding status, strategy, farm operations and farm offers (.7).	1.70	450.50	MME
	[Asset analysis and recovery] (KM Homes)	1.30	344.50	GFG

Conferences with counsel regarding motion for habeas corpus and deposition of Aubrey Lee Price, email to opposing counsel regarding consent to depose Mr. Price (.6); revise reply in support of PFGRE motion (.7).

[Asset analysis and recovery] (KM Homes) (Reduced time) Trial preparation conferences with team members regarding all trial issues and testimony and deposition of Aubrey Price (1.4); research and revise reply in support of motion to add PFGRE as party plaintiff (2.1).	3.50	927.50	GFG
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[Asset analysis and recovery] (KM Homes) Emails with team member and the Receiver regarding order of proof and outlines for trial, revise order of proof and distribute (.4).	0.40	106.00	GFG
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[Asset analysis and recovery] Meet with Receiver and telephone call with Venezuela Counsel and Receiver to prepare for call with A. Price, O. Lwis and Venezuela counsel (.3); telephone call with A. Price, O. Lwis, Receiver and Venezuela counsel to discuss various matters including the farms, their harvests, and the bank accounts in Venezuela, the transfers of funds between O. Lwis and A. Price, amounts that each of them owes the other, O. Lwis's condo in Florida, and other matters (1.5); confer with Receiver regarding new information and claims made by O. Lwis and strategy for confirming that information and investigating those claims and following up on obtaining certain records and correspondence allegedly supporting his positions (.5); telephone call from Venezuela counsel regarding Apostile for Notarized Power of Attorney and follow up with jail to confirm new notarization of Power of Attorney (.2); work on gathering additional documents regarding transfers with certain third parties, investors and potential fraudulent transferees and coordinate copying them to DVD (.4); prepare and send email responding to counsel for certain investor who received net gains providing and explaining Insolvency and Ponzi/fraud analysis, explaining the applicable fraudulent transfer law and the Receiver's	4.90	1,298.50	KDM
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rights thereunder, and requesting offer to return net gains to the Estate (.8); emails with Receiver regarding status of scheduling of Nelson Mullins mediation (.1); discuss with Receiver status of scheduling of trial deposition of A. Price (.1); coordinate contacting jail to determine whether A. Price will be moved to a facility in Savannah for purposes of planning trial deposition (.1); emails from Venezuela counsel and Receiver regarding documents provided by O. Lwis purporting to support his claim regarding the terms of the sale of the sugar cane farm and other documents provided by A. Price regarding the terms of the sale (.1); email from counsel for MCBI regarding upcoming meeting with counsel for the FDIC-R and documents supporting claims and strategize with team members regarding relevant documents (.3); review letter from potential fraudulent transferee regarding his lack of knowledge or involvement with Defendants and exchange telephone calls to discuss documents he will provide to prove his position and his identity so A. Price and others can confirm (.3); review letter from U.S. Natural Gas Fund, LP regarding PFG's investment and work on investigating whether PFG still owns shares (.2).

[Business operations] Review Notice of Administrative Dissolution from State of Georgia Office of Secretary of State and forward to and exchange emails with counsel for MCBI (.2).	0.20	53.00	KDM
[Case administration] Emails to and from counsel for FDIC-R regarding status of finalizing Partial Settlement Agreement and Assignment Agreement resolving real estate issues and coordinate follow up telephone call (.2); report status of Agreements to Receiver and benefits of those Agreements to the Estate (.2).	0.40	106.00	KDM
[Asset analysis and recovery] Telephone call with Venezuelan counsel regarding O. Lwis investigation and status (.7).	0.70	185.50	MDV

Apr-02-14	[Asset analysis and recovery] (KM Homes) Review and revise motion in limine (1.0); review KM Homes's motion in limine (.4); review pretrial order, exhibits, depositions and meeting with counsel regarding trial preparation (4.5); review and revise reply in support of Motion to amend to add PFGRE and conferences with counsel regarding same (1.5).	7.40	1,961.00	MME
	[Asset analysis and recovery] (KM Homes) Work on Motion in Limine.	2.10	556.50	PFV
	[Asset analysis and recovery] (KM Homes) Review proof of facts outline.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Review exhibits for purposes of paring down list.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Review KM Homes tax returns and conference regarding same.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with Melanie Damian and team members regarding trial preparation strategy.	3.80	1,007.00	PFV
	[Asset analysis and recovery] (KM Homes) Preparation of question outline for Mr. Roberts.	0.70	185.50	PFV
	[Asset analysis and recovery] (KM Homes) Conferences, research and emails with team members regarding interest issue and other issues related to jury instructions and verdict form, prepare for deposition of Aubrey Price (.7).	0.70	185.50	GFG
	[Asset analysis and recovery] (KM Homes) Conferences with team members regarding deposition and testimony of Mr. Price, draft response to opposing counsel regarding questions about Price interview (.5); revise motion to add PFGRE (3.5); conferences regarding trial preparation, testimony, opening, closing and pretrial motions, prepare for trial	8.90	2,358.50	GFG

with witness outlines and issue outlines, review exhibits and transcripts, revise motion in limine, review reply brief regarding motion to strike answer and defenses to counterclaim (4.9).

[Asset analysis and recovery] (KM Homes) Review invoices from process service and coordinate payment (.1); assist with scheduling and coordinating with all interested parties trial deposition of A. Price (.3); review draft of Plaintiff's Motion in Limine and strategize with Receiver and team members regarding revisions to be made (.7); work on making revisions and additions to Motion in Limine, review and analyze applicable cases, and confer with Receiver and team members regarding additional revisions (2.8); make final revisions to Motion in Limine and coordinate filing with the Court (.5); work with Receiver and team members on formulating strategies for presenting evidence and establishing claims at trial and bases for objecting to potential evidence to be presented by Defendant (1.9); review Defendant's Reply to Plaintiff's Response to Defendant's Motion to Strike Plaintiff's Answer and Affirmative Defenses and discuss arguments raised with team members (.4); review email from counsel for Defendant regarding preparation and filing of revised Pretrial Order and discuss time table and revisions with team members (.2); begin reviewing Defendant's Motion in Limine and discuss certain arguments raised with Receiver and team members (.6).	7.50	1,987.50	KDM
[Asset analysis and recovery] Emails to and from counsel for investor with net gains regarding forensic analysis and support for Receiver's fraudulent transfer claim provided to counsel for purposes of settlement negotiations and his client's considering those documents and formulating settlement offer (.2); telephone call from counsel for investor who received net gain regarding agreement to pay the Estate an amount to settle all claims in exchange for a general release (.2).	0.40	106.00	KDM

	[Case administration] Emails to and from counsel for FDIC-R regarding Partial Settlement Agreement and Assignment Agreement and moving conference call to finalize terms and form of Agreements (.1); telephone call with counsel for FDIC-R regarding agreement to final terms and finalizing of settlement documents (.3); report to Receiver status of Agreements regarding real estate issues (.1); meet with Receiver and team members to discuss settlement proposal from FDIC-R regarding all other issues including each Receiver's claim against the other Receivership Estate and strategize regarding responding to that proposal (.7); strategize regarding MCBF's prosecution of its claim against the FDIC-R and need to resolve that action in connection with global settlement with FDIC-R (.2).	1.40	371.00	KDM
	[Asset analysis and recovery] (KM Homes) Prepare Trial Binders for trial team in preparation for upcoming trial in the KM Homes action.	2.50	187.50	pl
Apr-03-14	[Asset analysis and recovery] (KM Homes) Review and revise reply in support of motion to add PFGRE (.7); review exhibits and trial preparation (1.4).	2.10	556.50	MME
	[Asset analysis and recovery] (KM Homes) Trial preparations.	4.80	1,272.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on reply in support of motion to add PFGRE.	1.20	318.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on deposition review of multiple potential witnesses.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Revise reply in support of PFGRE motion and revise pursuant to comments of Receiver and team members, revise witness outlines regarding PFGRE issue, research impact of PFGRE issue on defenses of KM Homes (5.2); emails and conferences with team members	5.50	1,457.50	GFG

and opposing counsel regarding revisions to pretrial order (.3).

[Asset analysis and recovery] (KM Homes) Conferences with team members regarding reply in support of PFGRE motion, draft inserts and footnotes and finalize (.8).	0.80	212.00	GFG
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[Case administration] Review email from counsel for the FDIC, conference regarding resolution of FDIC issues, review file regarding deadlines and status of FDIC related issues (.4).	0.40	106.00	GFG
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[Asset analysis and recovery] (KM Homes) Review emails with counsel for Defendant regarding revising Pretrial Order and coordinating exchange and proposed revisions (.2); review draft of Plaintiff's Reply to Defendant's Objection to Plaintiff's Motion to Add PFGRE, LLC as Party Plaintiff and strategize with team members regarding revisions to be made (.4); review and finalize Subpoena for Deposition to be served on Price, coordinate serving A. Price by serving Captain of Sheriff's office where A. Price is being detained and serving copy on criminal counsel for A. Price, and coordinate preparing Notice of Taking Trial Testimony by Deposition, review that Notice and coordinate filing with the Court (.2); meet with Receiver and team members regarding Defendant's planned objection to taking A. Price's trial testimony and AUSA's objection to the Court's issuance of a Writ of Habeas Corpus so A. Price can testify at trial (.8); send email to counsel for Defendant requesting consent to issuance of Writ of Habeas Corpus (.1); strategize with Receiver and team members regarding filing Petition for Writ of Habeas Corpus notwithstanding the AUSA's objection in light of Defendant's objection to the trial deposition and revise Petition and Writ to reflect Defendant's and AUSA's positions as to the Writ and Price's trial deposition (1.1).	2.80	742.00	KDM
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[Asset analysis and recovery] Telephone calls to and from counsel for a particular investor	0.20	53.00	KDM
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who received net gains regarding terms of payment to Receiver to settle claims to avoid fraudulent transfers (.2).

	[Case administration] Telephone call with counsel for SEC regarding latest settlement proposal from counsel for FDIC-R regarding all issues except the real estate issue, provide background information and update regarding status of Receivership, KM Homes action, MCBI Action, claims against insurance policies, and interview with A. Price (.6); strategize with team members regarding responding to FDIC-R's counsel's proposal (.2); telephone calls and emails from and to investor requesting certain information for her tax filings, locate the requested information, and coordinate providing such information to the investor (.3).	1.10	291.50	KDM
	[Asset analysis and recovery] (KM Homes) Prepare Amended Trial Subpoena for Keith McSwain and Patrick Tuley and prepare Trial Subpoena for Stephen Roberts.	0.60	45.00	pl
	[Asset analysis and recovery] (KM Homes) Telephone communication with Captain of Bulloch County Sheriff's Office in reference to coordinating time, date and place of Aubrey Lee Price's deposition (.3); prepare subpoena for deposition of Aubrey Lee Price and Notice of Taking Deposit on of Aubrey Lee Price (.3).	0.60	45.00	pl
	[Asset analysis and recovery] (KM Homes) Prepare correspondence to Department of State Division of Corporation regarding request for certified copies of Articles of Organization for PFG, LLC and PFGRE, LLC.	0.20	15.00	pl
	[Asset analysis and recovery] (No charge) Assist attorney G. Giberson and P. Valori in finalizing Reply to Defendant's Objection to Plaintiff's Motion to Add PFGRE, LLC as a Party Plaintiff and file electronically.	2.30	0.00	pl
Apr-04-14	[Asset analysis and recovery] (KM Homes) Review transcripts in preparation for trial (2.1); receipt and review of Court's order	3.90	1,033.50	MME

and meeting with counsel regarding status and strategy (.8); review direct testimony with counsel (1.0).

[Asset analysis and recovery] (KM Homes) Work on direct examination of Ms. Damian.	1.00	265.00	PFV
[Asset analysis and recovery] (KM Homes) Work on direct examination of Mr. Roberts.	1.00	265.00	PFV
[Asset analysis and recovery] (KM Homes) Review order on PFGRE Motion and Motion to Strike Answers.	0.30	79.50	PFV
[Asset analysis and recovery] (KM Homes) Conference regarding opposition to Defendant's Motion in Limine.	0.50	132.50	PFV
[Asset analysis and recovery] (KM Homes) Work on issue of interest and research other issues related to trial, emails with team members regarding research project, review order on outstanding motions, conferences with team members regarding order and strategy, work on trial outlines and issues related to pretrial conference, review email from opposing counsel to the Court regarding deposition of Aubrey Price, conferences with the Receiver and team member regarding trial preparation, and prepare index of all exhibits and revise exhibit list.	7.50	1,987.50	GFG
[Asset disposition] Email from Venezuela counsel regarding offer to purchase one of the farms and review offer (.3).	0.30	79.50	KDM
[Asset analysis and recovery] (KM Homes) Meet with Receiver and team members regarding revisions to Petition for Writ of Habeas Corpus Ad Testificandum and revise Petition and Writ (.4); send email to counsel for Defendant regarding consent to Petition (.1); finalize Petition and Writ and coordinate filing with the Court (.2); finish reviewing Defendant's Consolidated Motion in Limine and case law cited therein (1.2); review Court's Order denying as moot Receiver's	5.40	1,431.00	KDM

Motion to add PFGRE as party and denying Defendant's Motion to strike Plaintiff's Answer to Counterclaim and strategize with Receiver and team members regarding that Order's effect on trial strategy and our Response to Defendant's Motion in Limine (.5); meet with Receiver and team members regarding arguments raised in Defendant's Motion in Limine, law applicable to those arguments, formulate response arguments, discuss supporting legal authority, and refine Witness and Exhibit Lists (1.3); review case law regarding business records related rules of evidence in context of receivership and discuss with team members (.3); coordinate research on various issues to be addressed in Response to Defendant's Motion in Limine (.4); receive preliminary report of research findings and coordinate further research (.5); review email from Defendant's counsel to Court regarding Plaintiff's Notice of Trial Deposition and Writ of Habeas Corpus Ad Testificandum and intention to file objections with the Court and strategize with team members regarding preparing response email to Court (.4); review Defendant's Notice of Intent to file Objection to Petition for Writ of Habeas Corpus (.1).

[Asset analysis and recovery] Telephone call from counsel for investor who received net gains conveying settlement offer (.2); email from counsel from another investor who received a net gain regarding the status of his consideration of the documents and insolvency analysis provided to him for purposes of making a settlement offer (.1).	0.30	79.50	KDM
[Case administration] Review list of information that tax consultant requires to prepare tax returns for Receivership Entities and begin gathering information (.3).	0.30	79.50	KDM
[Asset analysis and recovery] (KM Homes) Research regarding proper use of motion in limine to exclude evidence; ability of receiver to authenticate corporate documents; use of records custodian to authenticate bank statements; compliance with rules 803 and 902	5.20	1,378.00	CP

for self authenticating documents and the hearsay exception applied to bank statements; ability of witness to testify based on personal knowledge from document review pursuant to rule 602; and review case law and prepare legal argument.

Apr-05-14	[Asset analysis and recovery] (KM Homes) Prepare for trial with counsel (1.0); review letter to Judge Batten regarding trial deposition of Price and meeting with counsel to discuss response (.5); review revised witness and exhibit lists (.4).	1.90	503.50	MME
	[Asset analysis and recovery] (KM Homes) Review correspondence from opposing counsel to court regarding prior testimony and conference with trial team regarding same and preparation of response.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Review exhibits and meet with trial team regarding evidence presentation, authority, and hearsay issues.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference with trial team regarding burden of proof.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise Motion to permit electronic equipment in the courtroom.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Review open items list and address staffing issues for trial.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Review case law regarding authentication of business record by all receivers.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Review courtroom rules regarding electronic equipment and exhibits, and voir dire.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Conferences with Receiver and team members	3.30	874.50	GFG

regarding trial preparation, revise exhibits list, revise index and summary of exhibits, revise witness outlines.

	[Asset analysis and recovery] (KM Homes) Assist C. Perez with research and formulating arguments for response to Defendant's Consolidated Motion in Limine (2.6); review portions of draft Response, review certain cases, and coordinate further research and additions to Response (1.8); emails with Receiver regarding transfers between Receivership Entities and K. McSwain, locate and review forensic analysis of those transfers and send to Receiver (.3).	4.70	1,245.50	KDM
	[Asset analysis and recovery] (KM Homes) Continue drafting response to motion in limine; telephone call with G. Giberson regarding strategy for response.	3.40	901.00	CP
	[Asset analysis and recovery] (KM Homes) (No charge) Assist P. Valori and G. Giberson in preparing for upcoming trial in the KM Homes matter including finalizing all exhibits.	4.80	0.00	pl
	[Asset analysis and recovery] (KM Homes) Prepare motion to allow electronics into the courtroom and proposed order regarding same for P. Valori's review.	0.50	37.50	pl
Apr-06-14	[Asset analysis and recovery] (KM Homes) Review and revise response to motion in limine (.5); prepare for trial with counsel (1.5); review deposition transcripts (1.0).	3.00	795.00	MME
	[Asset analysis and recovery] (KM Homes) Review revised exhibit list and make additional revisions and prepare emails to Guy Giberson and to Mr. Leach regarding same.	0.80	212.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on examination of Melanie Damian.	0.70	185.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise reply in support of Motion	3.00	795.00	PFV

in Limine, review deposition of Mr. McSwain and impeachment materials.

[Asset analysis and recovery] (KM Homes) Review question outline for trial.	1.00	265.00	PFV
[Asset analysis and recovery] (KM Homes) Emails regarding pretrial preparation, draft response to KM Homes' email to the Court regarding Aubrey Price and distribute to trial team, and prepare pretrial documents.	3.80	1,007.00	GFG
[Case administration] Draft email to Al Curley regarding outstanding FDIC issues.	0.10	26.50	GFG
[Asset analysis and recovery] (KM Homes) Work on resolving issues related to A. Price's criminal counsel's consent to Receiver's in-person interview of Price and A. Price's possible invocation of 5th Amendment right at deposition or trial, locate email from criminal counsel providing consent to interview and circulate among team members (.4); continue assisting C. Perez with preparing the Response to Defendant's Consolidated Motion in Limine and addressing certain research issues and review applicable Federal Rules of Evidence and case law interpreting and applying them (2.4); review and revise complete first draft of Response brief, coordinate further research and insertion of citations and analysis, and send revised draft to Receiver and team members for review (2.3); review draft Motion to bring electronic equipment to trial and email from Defendant's counsel consenting to requested relief (.1); review draft letter to Court responding to Defendant's counsel's letter regarding permitting A. Price to testify as a witness among other related matters and provide information to be included in letter (.4).	5.60	1,484.00	KDM
[Case administration] Strategize with team members regarding terms of counteroffer to be proposed to counsel for FDIC-R for global settlement of claims against respective receivership Estates and review and confirm proposed terms (.2).	0.20	53.00	KDM

	[Asset analysis and recovery] (KM Homes) Revise response to motion in limine (1.3); perform research regarding disclosure of impeachment witness and review pretrial order regarding disclosure requirements (1.2); review Court Order denying as moot Receivers motion to add PFGRE as party and draft argument regarding same for response to motion in limine (1.1).	3.60	954.00	CP
Apr-07-14	[Asset analysis and recovery] (KM Homes) Review and revise email regarding Price as a witness.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding testimony of Mr. McSwain and impeachment material.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference regarding revised witness and exhibit lists and review same.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on trial preparations.	2.00	530.00	PFV
	[Asset analysis and recovery] (KM Homes) Telephone conferences with Al Curley regarding pretrial issues (0.4); conferences with trial team members regarding Price related email from opposing counsel, review email from the Court, and revise email response to KM Homes's email regarding Price (1.2); continue pretrial preparation with witness outlines, review of exhibits and indexing on issues, emails and conferences with trial team regarding research projects (4.8); prepare for trial (1.8).	7.60	2,014.00	GFG
	[Asset analysis and recovery] (MCBI Action) Confer with Receiver regarding upcoming deadlines including deadline for Defendants to respond to Third Amended Complaint (.2); begin reviewing Individual Defendants' Motion to Dismiss Third Amended Complaint and Memorandum of Law in Support (.4).	0.60	159.00	KDM

<p>[Asset analysis and recovery] (KM Homes) Email from Judge's Law Clerk requesting response to Defendant's counsel's letter to the Judge's chambers regarding our efforts to have A. Price appear at trial by Writ of Habeas Corpus or by deposition pursuant to Notice of Deposition, and related matters (.1); strategize with team members regarding response letter and legal research to be done regarding exclusion of witnesses (.6); meet with team to strategize regarding revising and finalizing Witness List and possible continuance of trial until after A. Price enters Plea Agreement in criminal case given his counsel's advice to invoke the 5th Amendment at trial and in deposition (.7); review and make final revisions to Motion to bring electronic equipment into Courtroom and coordinate filing with Court (.2); work on obtaining chain of custody affidavits from FBI and/or U.S. Attorney's Office for documents seized from A. Price's house in Bradenton, FL, including preparing and sending emails to FBI and AUSA (.4); email from FBI regarding obtaining chain of custody affidavit and communications with legal unit (.1); review report from G. Giberson regarding recent conversation with counsel for FDIC-R regarding production of documents and strategize with team members regarding FDIC-R's continuing obligation to produce documents pursuant to Subpoena previously issued to it, including tax returns and financial statements of K. McSwain and basis for introducing those documents into evidence at trial (.6); strategize with team members regarding research related to discovery issues including objections to subpoenas (.2); review Defendant's Response in Opposition to Petition for Writ of Habeas Corpus and strategize with team members regarding arguments to make in Reply Brief (.3).</p>	3.20	848.00	KDM
<p>[Asset analysis and recovery] Telephone calls to and from and email from counsel for MCBF regarding its action against FDIC-R in response to rejection of its claim against MB&T Estate and certain documents being requested in discovery (.3); review Driver's</p>	1.20	318.00	KDM

License from person with same name as potential fraudulent transferee claiming to not have received any funds and coordinate sending it to A. Price to confirm identity (.1); continue reviewing documents provided by former auditor of MCBI for purposes of locating tax returns to be analyzed to determine if MCBI is entitled to a tax refund from the IRS and strategize with team members regarding additional tax returns required to complete analysis (.8).

[Business operations] Review Notice from Florida Secretary of State regarding deadline to file annual registration for PFGIA, LLC, coordinate filing of renewal and review email confirmation of payment from Secretary of State (.2); continue working on gathering information and documents needed by tax consultant to prepare tax returns for receivership entities, locate and provide certain information, and coordinate determining amounts requested, including value of silver upon acquisition and sale (.5).	0.70	185.50	KDM
[Case administration] Receive report regarding telephone call with counsel for FDIC-R regarding Receiver's counteroffer to FDIC-R's latest settlement offer (.2).	0.20	53.00	KDM
[Asset analysis and recovery] KM Homes: Conference regarding request to suppress testimony of Aubrey Price and Motion for Directed Verdict (0.2); Research regarding introduction of evidence when witness is not permitted to testify (1.6). Research regarding excuse of local counsel from trial and pretrial conference (0.8); Revise Motion to excuse local counsel and send to opposing counsel to ask if they agree with motion (0.4); Research regarding objection by party to subpoena for documents of nonparty (0.7).	3.70	555.00	AF
[Asset analysis and recovery] Review letter from United State Commodity Fund, LLP regarding PFG's possible shares in Natural Gas Fund.	0.10	15.00	AF

	[Asset analysis and recovery] (KM Homes) Revise Response to Motion in Limine.	0.70	185.50	CP
Apr-08-14	[Asset analysis and recovery] (KM Homes) Draft email regarding correspondence to Judge regarding Price deposition.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and draft email regarding summary to be used at trial.	0.20	53.00	PFV
	[Asset analysis and recovery] Review and draft email regarding unavailable witnesses and use of depositions at trial.	0.10	26.50	PFV
	[Asset analysis and recovery] Draft email regarding impeachment by a statement of counsel.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Conferences regarding communications with Price and emails with team members (0.8); review email from Jim Price and telephone conference regarding Jim Price (0.4); work on trial preparation materials and revise exhibits index and witness issues outlines (2.3); prepare for deposition of Aubrey Lee Price (1.9); conferences with counsel regarding research (1.1); trial preparation (1.1).	6.80	1,802.00	GFG
	[Asset analysis and recovery] (KM Homes) Revise email submission to the Court with email attachments and dispatch (.6); review correspondence with the Court regarding submission of Review Order from the Court regarding Motion to take deposition of Aubrey Lee Price in KM Homes case and attention to logistical issues regarding deposition (.4); revise response to Defendant's Motion in Limine (.8); telephone conference with counsel for the FDIC regarding proposals regarding cross claims and related issues (.3); prepare revised witness list and submit to Defendant's counsel via email with exhibit files in compressed format (zip) in separate emails and cover email explaining production (.3); review FDIC production and attention to preparation of subpoena on FDIC in its	4.60	1,219.00	GFG

capacity as the Receiver regarding McSwain related documents (1.5); review Google production documents (.7).

[Asset analysis and recovery] Review FDIC production and attention to preparation of subpoena on FDIC in its capacity as the Receiver regarding McSwain related documents (1.5).	1.50	397.50	GFG
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[Case administration] Telephone conference with counsel for the FDIC regarding proposals regarding cross claims and related issues (.3).	0.30	79.50	GFG
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[Asset analysis and recovery] Meet with Receiver and M.C. Espenkotter regarding the Receiver's claim against MCBI and its 2012 Ds and Os and claim against Travelers D&O Policy for 2012 and gather and provide background information and numerous documents necessary to formulate those claims (1.2); meet with Receiver and M.C. Espenkotter regarding the Receiver's claims against certain financial advisors and Montgomery Asset Management's E&O policy and work on gathering and providing information and documents necessary to formulate those claims (.8); strategize with Receiver and team members regarding obtaining documents that are responsive to our original subpoena to the FDIC-R but which were not previously produced, communications with FDIC-R's counsel regarding obtaining such documents and FDIC-R's request that we issue another Subpoena and review, finalize and sign follow-up Subpoena to the FDIC-R (.3).	2.30	609.50	KDM
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[Asset analysis and recovery] (KM Homes) Emails with FBI agent regarding need for Touhy request to FBI and its General Counsel, Assistant Attorney General, and the AUSA prosecuting criminal case in E.D.N.Y. to obtain a chain of custody Affidavit for the documents the FBI seized from Price's house in Bradenton (.4); conduct research regarding form and requirements for Touhy request (.8); prepare Touhy request letter, send draft to FBI	3.20	848.00	KDM
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agent for review, and exchange emails with FBI agent regarding specificity of letter and appropriate government agents and counsel to receive notice and timetable for responding to Touhy request (.8); have Receiver review and approve form of Touhy request letter and coordinate finalizing and sending to appropriate government agents and counsel (.3); review and provide input to G. Giberson for final revision to letter to Judge regarding Defendant's objection to our Notice of Deposition for A. Price (.2); email from Judge's law clerk regarding submission to the Judge of our Notice, Defendant's Objection and each parties letters regarding the dispute (.1); review Order allowing electronic equipment in courtroom (.1); email from counsel for Defendant regarding documents recently produced by Google which may become trial exhibits and peruse those documents (.2); review Order overruling Defendant's Objection to Notice of Deposition of Price and discuss preparations for deposition with team members (.2); receive report regarding efforts to service certain trial witnesses and strategize regarding having them served (.1).

[Asset analysis and recovery] (MCBI Action) Continue reviewing Defendants' Memorandum of Law in Support of Motion to Dismiss Third Amended Complain and confer with team members regarding need for additional time to respond to Motion (.3); emails with counsel for Defendants agreeing to requested extension of time and coordinate preparation of Motion for extension of time (.1).

[Asset analysis and recovery] KM Homes: Draft Rule 50(a) Motion (3.2).

[Asset analysis and recovery] Email to Liz Gordillo regarding obtaining legal advice for filing suit in Guatemala.

Apr-09-14

[Asset disposition] Review letters from Jim Price and A. Price regarding O. Lwis, the farms in Venezuela and the condominium in

0.40

106.00

KDM

3.20

480.00

AF

0.10

15.00

AF

0.30

79.50

KDM

Orlando and forward to Venezuela counsel for purposes of negotiations with O. Lwis (.3).

<p>[Asset analysis and recovery] (KM Homes) Review proposed final revisions to Plaintiff's Response to Defendant's Motion in Limine, make final revisions and coordinate filing with the Court (.3); review Defendant's Response to Plaintiff's Motion in Limine and discuss with team members in preparation for trial (.6); telephone calls with Receiver regarding preparing for deposition of A. Price and the possibility of his invoking the 5th Amendment in response to our questions (.2); telephone call to Jim Price regarding A. Price's upcoming deposition and whether he intends to invoke the 5th Amendment, and the status of his criminal case (.2); strategize with team members regarding issues to be researched regarding a deponent's invocation of the 5th Amendment in response to certain questions but not others and effect of admissibility of testimony (.4); receive report regarding research findings for issues related to deponent's invocation of 5th Amendment and discuss ramification at trial and strategy for dealing with issues at deposition (.9); email from Jim Price regarding update on A. Price's criminal case and upcoming hearing, communications between Keith McSwain's attorney and A. Price's criminal attorney, and status of upcoming deposition, and discuss with team members for purposes of strategy for deposition (.4); emails with counsel for Defendant regarding working on Pretrial Order and discuss logistics with team members (.1).</p>	3.10	821.50	KDM
<p>[Asset analysis and recovery] Telephone calls to and from counsel for investor who received net gains regarding status of his clients consideration of documents provided in support of Receiver's claim, certain details of those documents, the status of the Receiver's filing an action against investor, and additional time to make settlement offer (.4).</p>	0.40	106.00	KDM
<p>[Asset analysis and recovery] KM Homes: Create research binder for trial (2.0); Draft</p>	6.60	990.00	AF

email regarding use of summary of KM Homes bank documents and send to P. Valori and G. Giberson (0.3). Research regarding use of portions of motion for summary judgment to impeach (2.4); Research regarding permissibility of direct testimony if witness pleads the fifth on cross (1.9).

	[Asset analysis and recovery] Review correspondence from Aubrey Lee Price.	0.40	60.00	DMC
Apr-10-14	[Asset analysis and recovery] (KM Homes) Review and draft email regarding use of factual statements regarding motions for summary judgement and statements of counsel to impeach.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Review, work on, and revise stipulation of facts.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and draft email regarding KM Homes prior position that the transactions were loans.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Review email regarding Fifth Amendment research (0.1); draft response regarding same (0.1).	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise proposed stipulation and conference regarding same as well as testimony of Price and issues regarding exhibit list.	0.70	185.50	PFV
	[Asset analysis and recovery] (KM Homes) Conferences regarding revisions to pretrial order and work on pretrial order, revise stipulations and email to opposing counsel.	0.80	212.00	GFG
	[Asset analysis and recovery] (KM Homes) Conferences regarding changes to pretrial order and preparation for call with Defendant's counsel and attend conference with Defendant's counsel to discuss changes to pretrial order (2.3).	2.30	609.50	GFG

[Asset analysis and recovery] Draft amended complaint in S.D. of Georgia action against FDIC-R, revise and file, review file regarding S.D. Ga. action.	1.50	397.50	GFG
[Asset analysis and recovery] (KM Homes) Review production provided by Defendant and draft objections, emails and telephone conferences with Receiver and team members regarding pretrial preparation and objections to exhibits, research and revise objections to Defendant's exhibits, and revise pretrial preparation materials in abbreviated form.	3.00	795.00	GFG
[Asset analysis and recovery] (KM Homes) Telephone call from A. Price regarding his upcoming deposition and whether he intends to invoke the 5th Amendment, likelihood of Court granting Petition for Writ of Habeas Corpus for him to appear and testify at trial, purpose and outcome of hearing in criminal court this morning and status of criminal case, and various other matters (.3); strategize with team members regarding A. Price's deposition and issues that may arise depending on Defendant's counsel's questions (.6); email from counsel for Defendant regarding conference call necessary to finalize Pretrial Order and other related matters including objections to exhibits (.1); strategize with team members regarding upcoming call with Defendant's counsel regarding Pretrial Order and related matters (.3); review Order granting motion to excuse local counsel from pretrial conference and trial (.1); strategize with team members regarding FDIC-R's attendance at deposition of A. Price (.2); emails from counsel for Defendant describing and attaching trial exhibits and coordinate organizing of exhibits for use at trial (.2); review emails with counsel for Defendant regarding draft Stipulation of Facts to be attached to Pretrial Order, review that Stipulation and confer with team members (.1); review Proof of Service of Notice of Taking Deposition for Trial of A. Price and follow up on confirming whether A. Price will remain in Bulloch County Sheriff's Office through the date of the deposition (.1).	2.00	530.00	KDM

<p>[Asset analysis and recovery] Emails to and from Venezuela counsel regarding status of investigation into accounts of A. Price in Venezuela and related matters, and A. Price's review of documents seized by FBI to locate account records (.3); review Apostilles obtained for Powers of Attorney for A. Price and coordinate sending to Venezuela counsel by email and Federal Express (.1); emails with Receiver regarding deadline to file Amended Complaint against FDIC-R and revisions to be made and confer with team members regarding those revisions and filing of Amended Complaint in light of FDIC-R's delay in responding to our counteroffer for a global settlement (.2); telephone call and email to counsel for R. Price regarding turning over the house to the Receivership Estate and the status of mortgage payments, outstanding debt to mortgagee, and whether foreclosure proceeding has been commenced (.2); review letter from FDIC regarding Subpoena recently issued requesting documents previously requested and calendar deadline to respond to Subpoena based on service date (.1); exchange emails with Receiver and G. Giberson regarding status of preparation of Amended Complaint against FDIC-R in action brought in S.D. Ga. and further revisions to be made (.2); review and proposed final revisions to Amended Complaint (1.2); send email to Receiver summarizing revisions from original complaint and proposed final revisions (.1); receive report regarding status of responses from investors with net gains and potential fraudulent transferees and coordinate following up with those who have not yet responded (.5).</p>	2.90	768.50	KDM
<p>[Asset analysis and recovery] KM Homes: Coordinate filing of motion to excuse local counsel (0.2); Research regarding using statements from pleading when questioning witnesses (1.8); Conference regarding revising pretrial order (0.1); Review pretrial order to determine if changes need to be made prior to filing revised pretrial order (0.4). Email to P. Valori and G. Giberson regarding use of</p>	3.10	465.00	AF

summary judgment as an admission (0.1);
Update research binder for trial (0.5).

	[Asset analysis and recovery] Email to Liz Gordillo regarding collecting a judgment in Guatemala and the statute of limitations in Guatemala.	0.20	30.00	AF
Apr-11-14	[Asset disposition] E-mail correspondence with Venezuelan counsel regarding offers on the Corn farm.	0.40	106.00	MME
	[Asset analysis and recovery] (KM Homes) Review KM Homes exhibit list for objections (1.0); telephone conferences with counsel regarding trial preparation (.5).	1.50	397.50	MME
	[Asset analysis and recovery] (KM Homes) Work on Exhibits, review of Defendant's Exhibit List.	0.70	185.50	PFV
	[Asset analysis and recovery] Work on revised jury verdict forms.	0.70	185.50	PFV
	[Asset analysis and recovery] Conference with opposing counsel.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Draft proposed changes to pretrial order and exhibits (0.6); emails regarding strategy and pretrial order related issues (0.4); telephone conferences regarding pretrial order issues (0.5); work on verdict form, pretrial stipulation, jury instructions and research in pretrial order (2.5); prepare for trial and deposition of Aubrey Lee Price (1.5); conferences regarding slide shows (0.2); prepare witness outlines and order of proof (1.2); attention to travel schedule regarding Price in Statesboro (0.3); review order of the Court (0.2); research Fifth Amendment related issues, emails with opposing counsel regarding pretrial order and attachments (0.2); prepare for trial (1.0).	9.10	2,411.50	GFG
	[Asset analysis and recovery] (KM Homes) Review emails with counsel for Defendant	1.20	318.00	KDM

regarding certain of our trial exhibits and discuss with team members our service of trial subpoenas on Defendant's counsel and review emails evidencing service to counsel (.2); review Certifications from Florida Secretary of State regarding Articles of Organization for PFG and PFGRE and Articles of Dissolution for PFGRE and coordinate organizing as trial exhibits (.2); review bank statements and Certification of Authenticity produced by Bank of America for certain accounts used for transfers with Defendant, confirm that they coordinate to relevant bank statements, and coordinate preparing them as trial exhibits (.3); review emails with Defendant's counsel regarding our exhibits and trial subpoenas to certain witnesses, review amended trial subpoenas, and confer with team members regarding exhibits and witnesses (.2); review Defendant's Notice of Filing Amendments to Pretrial Order and the revised Exhibits and discuss with team members (.3).

[Asset analysis and recovery] Review emails from R. Price and her attorney regarding the status of her mortgage payments on her house, the amount due to the mortgagee, the number of months in default, and related issues for purposes of her abandonment of house to the Estate and send email to counsel regarding identity of mortgagee for purposes of sending Receivership Order and enforcing the stay provision therein (.3); assist with investigation into mortgagee on Price's residence for purposes of sending Receivership Order (.7); telephone calls to and from J. Price regarding identity of mortgagee of Price residence and obtaining loan documents (.3); coordinate preparation of letter to mortgagee notifying it of Receivership, enclosing copy of Receivership Order, and explaining the stay imposed by the Court against any legal action against Estate Property, including foreclosure proceedings (.1); review and revise letter to mortgagee and coordinate service by fax and FedEx (.2); continue working with team members on contacting investors with net gains and potential fraudulent transferees to which we sent demand letters to follow up on

2.70

715.50

KDM

those demands (.4); email from Jim Price with recent correspondence between E. Marroquin and A. Price regarding PFG's loan and investment in SCAN International, review those emails and forward them to Receiver and Venezuela counsel for purposes of pursuing claims against principals of SCAN, and analyze information and strategize with team members for purposes of preparing complaint against principals of SCAN (.6); review letter from USDOJ to PFGBI regarding arraignment of A. Price and notice to victims of crimes he is accused of committing (.1).

	[Asset analysis and recovery] KM Homes: Draft outline of objections and motions to make at trial in order to preserve error on appeal.	2.60	390.00	AF
	[Asset analysis and recovery] Search for mortgage documents relating to property located in Valdosta, Georgia (1.3); Draft letter to AmeriSave regarding stay on foreclosure proceeding (0.3).	1.60	240.00	AF
	[Asset analysis and recovery] (KM Homes) (No charge) Begin preparing copies of trial exhibits and trial boxes in preparation for KM Homes trial scheduled to begin April 21, 2014.	3.00	0.00	pl
	[Asset analysis and recovery] (KM Homes) (No charge) Telephone call with AmeriSave regarding obtaining mailing address and fax number for purposes of sending demand letter regarding stay of foreclosure on Price residence.	0.20	0.00	pl
Apr-12-14	[Asset analysis and recovery] (KM Homes) Review direct examination for Price, provide comments to counsel.	0.50	132.50	MME
	[Asset analysis and recovery] (KM Homes) Review final filed revisions to pretrial order.	0.20	53.00	PFV
Apr-13-14	[Asset analysis and recovery] (KM Homes) Conferences with counsel regarding trial preparation and pretrial issues (0.4); research	4.20	1,113.00	GFG

pretrial related issues(1.6); prepare for deposition of Aubrey Lee Price (2.2).

Apr-14-14	[Asset analysis and recovery] (KM Homes) Review direct testimony of Price with counsel.	1.00	265.00	MME
	[Asset analysis and recovery] Email and calls with trial team regarding status and preparation for pretrial conference.	0.50	132.50	PFV
	[Asset analysis and recovery] Email to staff regarding trial binders.	0.10	26.50	PFV
	[Asset analysis and recovery] (KM Homes) Multiple conferences with trial team in preparation for pretrial conference and trial (0.8); prepare for deposition of Mr. Price with deposition exhibits indexed based on subject matter (4.0); research authentication issues (1.2); telephone conferences with counsel for FDIC regarding document production issues (0.3); review FDIC production documents (1.2); prepare for trial (1.1).	8.60	2,279.00	GFG
	[Asset analysis and recovery] (KM Homes) Telephone call from FBI regarding preparation of chain of custody affidavit regarding Price's documents seized from Bradenton house and need for Subpoena in addition to Touhy Request (.3); work on preparing Subpoena and document request, revise and coordinate service on FBI (.4); email from Jim Price regarding A. Price's intention to invoke the 5th Amendment on most subjects to be addressed at upcoming trial deposition and strategize with Receiver and team members regarding issues to be researched regarding Price's deposition and admission of certain relevant substitute evidence (.6); telephone call to Jim Price regarding A. Price's intention to invoke the 5th Amendment right in response to most questions to be asked at upcoming trial deposition and various related matters and strategize with team members regarding questions to be asked at deposition, Defendant's likely questions and objection, and our objections (.5); confer with team members regarding communications with	3.70	980.50	KDM

Defendant's counsel regarding Price's deposition, his alleged intention to invoke the 5th Amendment, and his criminal counsel's inability to attend deposition and review email summarizing Defendant's position regarding going forward with the deposition (.2); review email from Defendant's counsel to Judge's chambers regarding Price's alleged intention to invoke the 5th Amendment and his criminal counsel's inability to attend deposition and request to cancel and reschedule the deposition, strategize with team members regarding responding to that email, review emails correcting error in Defendant's counsel's email and email forwarding correction to Court, and assist Receiver with preparation of response email to the Court (.4); review Order overruling KM Homes' objection to Price's deposition, permitting use of deposition transcript at trial, and denying Writ of Habeas Corpus and strategize with team members regarding Court's ruling and approach to Price's deposition (.4); provide updates to Receiver and team member regarding status of obtaining chain of custody affidavit for documents that FBI seized from Price's Bradenton house and copied to disk and sent to Receiver and provide to Receiver summary of FBI's position with respect to producing custodian as witness and information for purposes of having witness available to appear telephonically if necessary at trial (.3); emails to and from FBI's assistant general counsel regarding receipt of Subpoena and arranging to have FBI agent available to testify at trial (.2); assist with organizing certain Exhibits and Deposition Designations for trial (.3); confer with Receiver regarding Defendant's response to our Motion in Limine and strategize regarding preparing for pretrial conference (.1).

[Asset analysis and recovery] Meet with Receiver regarding offer to settle claim against investors who received net gains, discuss amounts transferred between investors and PFG, LLC, and strategize regarding counteroffer (.2); telephone call to counsel for investors conveying settlement offer (.2).

0.40

106.00

KDM

[Case administration] Note deadline to file Reply Brief in support of Motion to Approve Claims Process and confer with team members regarding status of FDIC-R's consideration of our counteroffer to resolve all disputes between the two receivership estates (.2); telephone call to counsel for FDIC-R regarding FDIC-R's consideration of the Receiver's counteroffer, upcoming deadline to file Reply Brief, whether KM Homes asserted objection to the Receiver's subpoena for certain documents requested in prior subpoena, and status of production of those requested documents (.5).	0.70	185.50	KDM
[Asset analysis and recovery] (KM Homes) Research regarding rule for using summary and rule for self-authenticating bank records.	0.40	60.00	AF
[Asset analysis and recovery] KM Homes: Research regarding admission of recording of Price's interview at trial (1.7); Research regarding Confrontation clause not being applicable in civil cases (0.6).	2.30	345.00	AF
[Asset analysis and recovery] Email from Liz Gordillo regarding SCAN documents (0.1); Scan and email loan documents to Liz Gordillo (0.3).	0.40	60.00	AF
[Asset analysis and recovery] KM Homes: Update Research binder for trial (0.4); Print out deposition of Melanie Damian with designated portions highlighted (0.1).	0.50	75.00	AF
[Asset analysis and recovery] Review schedule of statute of limitations for net winners and fraudulent transferees.	0.30	45.00	DMC
[Asset analysis and recovery] (KM Homes) Assist Guy Giberson in gathering exhibits and preparing for deposition of Aubrey Lee Price.	3.50	262.50	pl
[Asset analysis and recovery] (KM Homes) Continue to work on trial exhibits for the KM Homes trial.	3.00	225.00	pl

Apr-15-14	[Asset analysis and recovery] (KM Homes) Conferences with counsel regarding Price deposition (.5); prepare for pretrial conference with counsel (1.2); review transcript of my deposition and designations (2.0).	3.70	980.50	MME
	[Case administration] (KM Homes) (No charge) Travel to Atlanta for Pre-trial conference.	3.00	0.00	MME
	[Asset analysis and recovery] Review pretrial order and rules regarding conference.	0.40	106.00	PFV
	[Asset analysis and recovery] Conference with Melanie Damian and staff regarding preparation for pretrial conference.	1.50	397.50	PFV
	[Asset analysis and recovery] (KM Homes) Work on use of confidential documents for litigation proceedings.	0.20	53.00	PFV
	[Asset analysis and recovery] (KM Homes) (No charge) Travel to Atlanta for pretrial conference.	3.00	0.00	PFV
	[Asset analysis and recovery] (KM Homes) Prepare for pretrial conference.	1.50	397.50	PFV
	[Asset analysis and recovery] (KM Homes) Prepare for deposition of Mr. Price (2.5); conferences and attend deposition of Aubrey Lee Price (3.5); telephone conferences Receiver and team members regarding strategy, research import of Fifth Amendment issue and conduct of opposing counsel (2.9).	8.90	2,358.50	GFG
	[Asset analysis and recovery] (KM Homes) (No charge) Travel to Statesboro for Deposition of A. L. Price.	3.40	0.00	GFG
	[Asset disposition] Emails to and from realtor for Longboat Key Property regarding recent communication with Code Enforcement regarding need to maintain overgrown landscaping and communications with landscaper regarding past due invoice, review that invoice, and coordinate payment thereof	0.60	159.00	KDM

and requesting that landscaper clean up the property (.3); emails from and to Venezuela counsel confirming receipt of signed and notarized Power of Attorney from A. Price with Apostille (.1); review emails from Venezuela counsel regarding recent offer to purchase corn farm and difficulties in having title and funds transferred and confer with Receiver (.2).

<p>[Asset analysis and recovery] (KM Homes) Email from Jim Price regarding recent communications with A. Price regarding upcoming deposition (.1); telephone calls with G. Giberson regarding status of deposition A. Price, his criminal attorney's appearance at deposition and strategize with Receiver and team members regarding proper and improper bases for A. Price's invoking the 5th Amendment to various types of questions unrelated to criminal action or charges, communications with AUSA regarding possibility of A. Price's cooperation lowering his recommended sentence and various related matters (.5); telephone call from G. Giberson regarding outcome of A. Price's deposition, his invocation of the 5th Amendment in response to all questions upon advice of his criminal counsel, his criminal counsel's explanation of basis for such invocation, and strategize with Receiver regarding issues to be researched related to such invocation for purposes of pretrial conference and trial (.4); confer with Receiver regarding status of receiving chain of custody affidavit from FBI regarding documents they seized from Price's Bradenton house and send email to counsel for FBI regarding timing of completion of affidavit and possible need to call agent as witness at trial (.2); telephone call and email from FBI's associate counsel regarding status of agent's execution of chain of custody affidavit and report status to Receiver (.3).</p>	1.50	397.50	KDM
<p>[Asset analysis and recovery] Review email from Guatemala counsel regarding statute of limitations applicable in Guatemala to claims for recovery of loans and fraudulent transfers and recommended strategy for pursuing those</p>	1.90	503.50	KDM

claims in the United States and domesticating judgment in Guatemala, and necessary research regarding similarity of laws underlying claims in both countries (.1); strategize regarding issues raised in Guatemala counsel's emails and coordinate research on similarity of laws underlying claims in Guatemala and United States and statute of limitations applicable to claims in the United States (.3); review various documents related to Defendants' involvement and transactions with Scan International and coordinate further review to confirm earliest date of transfer to Scan International of its principals for purposes of calculating expiration of applicable statute of limitations (.5); review Master Reconstruction of accounts prepared by forensic accountant for purposes of analyzing transfers between Defendants' and Scan and its principals and determining date of earliest transfer and exchange emails with forensic accountant regarding revising Master Reconstruction and preparing reports of transfers between Defendants' and Scan and its principals (.6); review and revise Local Rule 5.4 Certificate of Service for Subpoena served on FBI and coordinate filing with the Court (.1); email from counsel for FDIC-R regarding status of objections to our follow-up Subpoena for documents (.1); email from counsel for FDIC-R producing documents responsive to follow-up Subpoena, explaining nature and scope of documents and parties to which they are being produced, and objecting to further request for documents, and peruse documents produced (.2).

[Case administration] Email from counsel for FDIC-R proposing terms of resolution of outstanding issues between two receivership estates and analyze proposed terms with Receiver and team members and strategize regarding making counteroffer (.6); exchange emails with counsel for FDIC-R and counsel for SEC regarding need for further extension of time for Receiver to file Reply in support of Motion to approve claims process and distribution plan, confer with Receiver regarding basis for requested extension to be

1.60

424.00

KDM

included in Motion for extension (.3); prepare Motion for extension of time and send to counsel for FDIC-R for approval (.4); email from counsel for FDIC-R regarding consent to extension of time (.1); make final revision to Motion for extension, coordinate filing with the Court, and send update to Receiver regarding filing (.2).

[Asset analysis and recovery] (KM Homes) Telephone call with G. Giberson regarding Price invoking 5th Amendment (.2); review and edit draft of motion to compel Price testimony (.8); email regarding same with co-counsel (.1).	1.10	291.50	MDV
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[Asset analysis and recovery] SCAN: Email from Jorge Arenales regarding filing suit in Guatemala (0.2); Conference regarding strategy on filing suit against SCAN in Guatemala or U.S. (0.2); Search documents to find all transfers to SCAN (1.3).	1.70	255.00	AF
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[Asset analysis and recovery] KM Homes: research regarding recoupment as an equitable claim and Equitable defenses not being permitted in legal claims (1.2); Update Research Binder for pretrial conference (1.0); Research regarding equitable defenses in an action in law (1.7).	3.90	585.00	AF
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[Asset analysis and recovery] KM Homes: Draft Motion to Compel Deposition Testimony of Aubrey Price.	1.30	195.00	AF
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[Asset analysis and recovery] (KM Homes) Continue working on trial exhibits for the KM Homes matter(2.5); prepare hearing binders for attorney P. Valori in preparation for Pretrial Conference (2).	2.70	202.50	pl
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Apr-16-14	[Asset analysis and recovery] (KM Homes) Prepare for and attend pretrial conference (2.4); conference with counsel regarding status, strategy and potential resolution (.7).	3.10	821.50	MME
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[Case administration] (KM Homes) (No charge) Return travel from Atlanta.	2.80	0.00	MME
[Asset analysis and recovery] (KM Homes) Draft email to opposing counsel regarding settlement.	0.30	79.50	PFV
[Asset analysis and recovery] (KM Homes) (No charge) Return travel from pretrial conference.	2.80	0.00	PFV
[Asset analysis and recovery] (KM Homes) Prepare for and attend pretrial conference and become familiarized with Court room equipment.	2.40	636.00	PFV
[Asset analysis and recovery] (KM Homes) Conference with team regarding Price Fifth Amendment issue, pretrial, and preparation for trial.	1.50	397.50	PFV
[Asset analysis and recovery] (KM Homes) (Reduced time) Work on witness outlines and exhibits, research evidentiary issues, emails with team members regarding results of pretrial conference, review draft motion to compel testimony of Mr. Price and additional research regarding related issues (4.1); telephone conference with team members regarding results of pretrial conference and strategy, research admissibility of documents at issue in motion in limine that were not resolved, revise witness outlines and prepare exhibits table with key documents for each transfer (3.9).	4.00	1,060.00	GFG
[Asset disposition] Emails to and from realtor for Longboat Key property regarding latest notice and pictures from Code Enforcement and status of resolving payment issue with landscaper, review pictures, and coordinate with M. Dhanji resolution of issue and having landscaper to maintain property (.2); receive email confirming that payment dispute has been resolved and landscaper has commencing cleaning up the property (.1).	0.30	79.50	KDM

[Asset analysis and recovery] Email from counsel for FDIC-R regarding written correspondence from A. Price from jail and confer with team members regarding whether any such correspondence were received (.2); assist with efforts to locate certain potential fraudulent transferees (.2).	0.40	106.00	KDM
[Asset analysis and recovery] (KM Homes) Review Court's Minute Entry from Pretrial Conference regarding rulings on Motions in Limine (.1); review emails sent to Defendant's counsel regarding authentication of certain trial exhibits and forwarding those exhibits and discuss with Receiver (.2); meet with Receiver and team members to discuss outcome of Pretrial Conference and to strategize regarding trial preparation (.3).	0.60	159.00	KDM
[Asset analysis and recovery] (MCBI Action) Strategize with team members regarding preparation of Response to Defendants' Motion to Dismiss Third Amended Complaint, review emails with counsel for Defendants regarding extension of time to file that Response, and coordinate filing of Motion for extension of time (.3).	0.30	79.50	KDM
[Case administration] Review Order granting motion for extension of time to file Reply in support of Motion to approve claims process and distribution plan, send to Receiver, and coordinate calendaring of new deadline (.1).	0.10	26.50	KDM
[Asset analysis and recovery] (KM Homes) Review latest draft of motion to compel Price's testimony (.5); research regarding same (.5).	1.00	265.00	MDV
[Asset analysis and recovery] KM Homes: Conference regarding deposition of Aubrey Price (0.3); Revise Motion to Compel Deposition Testimony of Price (0.7).	1.00	150.00	AF
[Asset analysis and recovery] KM Homes: Research regarding adverse instruction for pleading the fifth.	1.80	270.00	AF

	[Asset analysis and recovery] KM Homes: Research local rules regarding expediting motion.	0.30	45.00	AF
	[Asset analysis and recovery] KM Homes: Draft Plaintiff's Objections to Defendant's Designation of Melanie Damian's Deposition.	2.10	315.00	AF
	[Administrative Report] Review file [0.8]; prepare outline for seventh status report [0.8]; work on status report [1.0].	2.60	390.00	DMC
	[Asset analysis and recovery] (KM Homes) Finalize and organize all trial exhibits for the KM Homes matter.	3.00	225.00	pl
Apr-17-14	[Asset analysis and recovery] (KM Homes) Prepare for trial, revise jury instructions, and review legal memorandum (5.6); conference with counsel regarding status, strategy and potential resolution (2.5).	8.10	2,146.50	MME
	[Asset analysis and recovery] (KM Homes) Conference with staff regarding jury instructions, preparation of trial binder organization.	0.30	79.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference with opposing counsel regarding settlement and conference with Receiver regarding same and prepare email to team members regarding same.	0.70	185.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise jury instructions.	0.80	212.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with Receiver and work on question outlines.	1.50	397.50	PFV
	[Asset analysis and recovery] (KM Homes) Conference with team regarding trial preparations, regarding Rule 50 motion, conference and prepare for the trial regarding question outlines, exhibits, review pleadings, motions, and transcripts.	8.80	2,332.00	PFV

[Asset analysis and recovery] (KM Homes) Draft multiple emails regarding settlement.	0.40	106.00	PFV
[Asset analysis and recovery] (KM Homes) Conferences with trial team regarding trial preparation, prepare exhibits, review financial documents, research evidentiary issues regarding Mr. Price and Ms. Giardina, revise opening argument outline and witness outlines with references to specified exhibits, conferences regarding traced transactions, conferences with trial team members regarding admissions in declarations and depositions.	6.90	1,828.50	GFG
[Asset disposition] Emails with realtor and M. Dhanji regarding status of clean up of Longboat Key property and negotiating the price of the project (.2); coordinate contacting realtor for purposes of negotiating listing agreement for sale of Price's residence in Valdosta, GA (.1); emails with realtor regarding updated marketing strategy for the Longboat Key property (.2).	0.50	132.50	KDM
[Asset analysis and recovery] Review updated Master Reconstruction for all Receivership Entities and affiliates and new forensic analysis of transfers between those entities and Scan International and its principals and exchange emails with forensic accountant regarding further analysis required and updating of Scan forensic analysis (.5); telephone calls with forensic accountant regarding various transfers between Scan International and Receivership Defendants and affiliates, preparation of updated analysis of those transfers and revisions to be made to Master Reconstruction (.5); review further updated analysis and Master Reconstruction and strategize with team members for purposes of preparing complaint against Scan International (.5); review A. Price's responses to our inquiries regarding identity of certain potential fraudulent transferees and coordinate notifying recipients of demand letters that they have been cleared and coordinate continued search for correct potential fraudulent transferees (.3); continue working on	2.60	689.00	KDM

following up on demand letters sent to investors with net gains and potential fraudulent transferees (.4); review documents provided by R. Price regarding the mortgage on the Price's residence and coordinate following up with mortgagee to confirm receipt of our letter and Court Orders and compliance with the stay provision (.4).

<p>[Asset analysis and recovery] (KM Homes) Telephone calls to and from counsel for FBI regarding affiant of the affidavit for chain of custody of the documents seized from A. Price's Bradenton house, form to be used for that affidavit, and business record affidavit (.3) report to the Receiver and team members status of obtaining that affidavit and discuss admissibility at trial (.2); review Plaintiff's Objections to Defendant's Designations of Receiver's deposition, Plaintiff's Designation of Deposition of Giardina, Notices of Appearance filed by counsel for Defendant, and other court filings (.3); confer with team members regarding research on assignment of claims for purposes of trial and strategize regarding research findings (.3); assist team members with organizing and confirming exhibits for trial (.4).</p>	1.50	397.50	KDM
<p>[Asset analysis and recovery] KM Homes: Review and Revise Motion for Judgment as a Matter of Law (0.4); Complete Trial Research Binder (0.3).</p>	0.70	105.00	AF
<p>[Asset analysis and recovery] KM Homes: Conference regarding closing arguments (0.3); Prepare powerpoint for closing argument (2.5); Revise Plaintiff's Objection to the Designation of M. Damian's Deposition and coordinate filing (0.3); Conference regarding jury instructions (0.2); Revise jury instructions and draft additional instructions (4.2); Research regarding equitable defenses against a Receiver (0.4); Review and revise Rule 50(a) Motion (0.5); Draft short paragraph regarding equitable defenses against Receiver for Rule 50(a) motion (0.3); Review verdict forms and make proposed changes (1.5); Draft designation of Kathryn Giardina (0.8); Further</p>	13.00	1,950.00	AF

revise jury instructions (1.5); Draft comments to the verdict form for the judicial law clerk (0.5);

[Asset analysis and recovery] KM Homes - Confer with Receiver regarding status and strategy.	0.30	45.00	DMC
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[Asset analysis and recovery] KM Homes - Research regarding enforceability of assignments.	4.70	705.00	DMC
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[Asset analysis and recovery] KM Homes - Review e-mail documents produced by Google, Inc [0.3]; confer with Receiver regarding same [0.2].	0.50	75.00	DMC
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[Administrative Report] (No charge) Review time entries and work performed by each professional for purposes of status report [1.3];work on status report [0.9].	2.20	0.00	DMC
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[Asset analysis and recovery] (KM Homes) (No charge) Assist attorneys P. Valori and G. Giberson in final preparations for Trial, prepare trial exhibit boxes and coordinate for shipment (3.0); update trial binders and prepare deposition transcript binder (2.0)	5.00	0.00	pl
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Apr-18-14	[Asset analysis and recovery] (KM Homes) Prepare for trial, revising jury instructions and verdict form.	2.50	662.50	MME
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[Asset analysis and recovery] (KM Homes) Email with associate regarding research regarding unavailability.	0.20	53.00	PFV
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[Asset analysis and recovery] (KM Homes) Conference with team regarding case themes, question outlines, verdict forms, and rule 50 (a) motion.	1.00	265.00	PFV
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[Asset analysis and recovery] (KM Homes) Review revised verdict form.	0.30	79.50	PFV
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[Asset analysis and recovery] (KM Homes) Review trial materials, opening, slide show,	6.50	1,722.50	GFG
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witness outlines, exhibits, transcripts, Rule 50 motions, voir dire questions, jury instructions, verdict form, dispositive motions and orders, PFGRE related briefs and order in preparation for trial.

[Asset disposition] Work on gathering pictures of Venezuela farm for purposes of marketing that property (.4); emails to and from counsel for R. Price regarding abandonment of the property to the Estate and proposed execution of Quit Claim Deed to effect the transfer (.2).	0.60	159.00	KDM
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[Asset analysis and recovery] (KM Homes) Confer with Receiver and team members regarding substitution of certain exhibits, assist with substitution, review and revise Notice of Filing Second Revised Exhibit List and Notice of Substitution of Plaintiff's Trial Exhibits, coordinate filing Notices with the Court and sending substituted exhibits to Defendant's counsel (.4); telephone calls and emails to counsel for FBI regarding status of preparation of Chain of Custody Form and Business Records Affidavit and report status to Receiver and team members (.3); strategize with team members regarding various witnesses and exhibits for trial, and certain rebuttal evidence, and need for Declaration from K. Giardina confirming her unavailability (.6); exchange multiple emails and telephone calls with counsel for K. Giardina and Jim Price regarding Declaration of K. Giardina regarding her unavailability, prepare Declaration and send to counsel and Jim Price for K. Giardina's review, revision and execution (.5); review Declaration signed by K. Giardina, revise Declaration and resend to Jim Price to have K. Giardina sign revised Declaration and exchange telephone calls with Jim Price to follow up on obtaining signed Declaration (.3); review final executed Declaration, confer with Receiver and coordinate service on Defendant's counsel (.2); confer with Receiver regarding documents in support for forensic analysis of transfers between PFG and K. McScwain, review forensic analysis and exchange emails with forensic account regarding those support	3.90	1,033.50	KDM
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documents (.5); review documents supporting forensic analysis of those transfers, exchange further emails with forensic accountant to clarify certain documents, and present documents to Receiver (1.1).

[Asset analysis and recovery] (MCBI Action) Review and revise Motion for Extension of Time to File Response to Defendants' Motions to Dismiss Third Amended Complaint and proposed Order granting Motion and coordinate filing with the Court (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] Work on following up with Amerisave regarding receipt of letter regarding stay imposed by Court's Order for purposes of preventing foreclosure proceeding against the Price residence (.2); emails to and from counsel for investor who received net gains regarding their response to demand letter for return of net gains and request for additional time to respond to demand after consultation with investor's accountant (.2).	0.40	106.00	KDM
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[Asset analysis and recovery] KM Homes: Research regarding use of deposition for unavailable witness (1.0); Update research binder (0.2).	1.20	180.00	AF
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[Asset analysis and recovery] KM Homes: Trial Preparation including revise closing argument power point, revise jury instructions, revise verdict forms, revise Rule 50(a) motion, and submit verdict form and jury instruction to judge's chambers.	9.00	1,350.00	AF
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[Asset analysis and recovery] KM Homes - Assist trial preparation [4.5]; research regarding claim splitting [0.6]; work on powerpoint presentation for opening and closing argument [2.5].	7.60	1,140.00	DMC
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[Asset analysis and recovery] (KM Homes) Assist attorney D. Carnright with power point presentation for purposes of finalizing closing arguments for the KM Homes trial.	3.50	262.50	pl
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	[Asset analysis and recovery] (KM Homes) Prepare Notice of Filing Plaintiff's Second Revised Exhibit List and Notice of Substitution of Plaintiff's Trial Exhibits 16 and 18 and file electronically.	0.60	45.00	pl
Apr-19-14	[Asset analysis and recovery] (KM Homes) Prepare for trial, review power point for opening and closing and prepare for direct examination.	1.50	397.50	MME
	[Asset analysis and recovery] (KM Homes) Review Rule 50(a) Motion and draft email regarding same.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Review opening statement slide show and prepare email regarding revisions to slide show.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Conferences with Melanie Damian regarding trial preparation, authentication of documents, witnesses, Rule 50 brief, exhibits, and other strategic issues (1.7); work on opening, slide shows, exhibits preparations, pretrial brief, effect of ruling on motions in limine, logistical issues related to exhibits and witnesses, review transcripts and declarations and general trial preparation (5.9).	7.60	2,014.00	GFG
	[Asset analysis and recovery] KM Homes: Trial preparation including revise closing argument powerpoint, create opening argument powerpoint, and revise Rule 50(a) motion.	6.30	945.00	AF
	[Asset analysis and recovery] KM Homes - trial preparation [0.6], confer with Receiver regarding opening statement and closing argument [1.1]; work on closing and opening argument presentation [3.5].	5.20	780.00	DMC
Apr-20-14	[Asset analysis and recovery] (KM Homes) Prepare for trial: review trial strategy, review exhibits, review opening and closing and prepare for direct examination.	7.50	1,987.50	MME

[Case administration] (KM Homes) (No charge) Travel to Atlanta for trial.	2.00	0.00	MME
[Asset analysis and recovery] (KM Homes) Work on trial preparation including opening statement and slide show.	2.50	662.50	PFV
[Asset analysis and recovery] (KM Homes) Deposition transcript review and trial preparation.	6.50	1,722.50	PFV
[Asset analysis and recovery] (KM Homes) Work with team members on formulation of counter arguments regarding KM Homes's position.	1.00	265.00	PFV
[Asset analysis and recovery] (KM Homes) (Reduced time) Meet with the Receiver and counsel to prepare for trial.	7.50	1,987.50	GFG
[Asset analysis and recovery] (KM Homes) Emails and telephone calls to and from FBI associate counsel regarding status of obtaining chain of custody forms for all FBI agents involved in seizure and transport of records from Price's house in Bradenton to AUSA's office in Brooklyn and preparation of business records affidavit (.5); emails and telephone calls to and from Receiver regarding status of FBI's production of chain of custody forms and business records affidavit (.2); review Plaintiff's proposed Jury Instructions, and Defendant's proposed Jury Instructions, Plaintiff's Revised Verdict Form, and Defendant's Revised Special Verdict Form, and confer with trial team members for purposes of arguments to be raised in any charging conference (.4); review Defendant's Objections to Plaintiff's Supplemental Designation of Deposition of Kathryn Giardina, and Defendant's Supplemental Objection to Plaintiff's Substituted Exhibit 18 (.1).	1.20	318.00	KDM
[Asset analysis and recovery] (KM Homes) Research regarding right to special interrogatory verdict form (1.0); Research regarding prejudgment interest (1.3); Trial	5.50	825.00	AF

preparation including revise opening and closing argument powerpoints, and revise the verdict form (3.2).

[Asset analysis and recovery] KM Homes - research regarding perjury as a result of notarizing false documents [0.9]; research regarding equitable considerations for applying setoff in receivership cases [1.2]; review and revise opening and closing argument presentation [0.9]; confer with team members regarding status [0.2].	3.20	480.00	DMC
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Apr-21-14	[Asset analysis and recovery] (KM Homes) Attend trial, revise jury instructions (7.0); conference with counsel regarding status, strategy (1.5); prepare for second day of trial including directed verdict arguments, accounting issues and case law (3.0).	11.50	3,047.50	MME
	[Asset analysis and recovery] (KM Homes) Prepare for first day of trial.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Attend first day of trial and conference with Receiver and G. Giberson regarding strategy.	8.50	2,252.50	PFV
	[Asset analysis and recovery] (KM Homes) Review and revise witness outline and opening argument and presentation of evidence.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Review deposition of Mr. McSwain and Mr. Roberts regarding revised cross examination based upon opening statement and first day cross.	2.00	530.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on analysis of personal financial statement and the tax return regarding inconsistencies in defendant's case and conference with expert regarding same.	1.00	265.00	PFV
	[Asset analysis and recovery] (KM Homes) Work on Rule 50(a) motion.	1.00	265.00	PFV

[Asset analysis and recovery] (KM Homes) Work on closing argument.	1.00	265.00	PFV
[Asset analysis and recovery] (KM Homes) (Reduced time) Prepare for trial and attend trial in KM Homes matter, conferences with client, Melanie Damian, and P. Valori regarding strategy (9.3); conference with Melanie Damian P. Valori regarding strategy and preparation for second day of trial (5.2).	11.50	3,047.50	GFG
[Asset analysis and recovery] (KM Homes) Continue working with FBI associate counsel on obtaining chain of custody forms for all FBI agents involved in seizure and transport of records from Price's house in Bradenton to AUSA's office in Brooklyn and preparation of business records affidavit, exchanging multiple emails and telephone calls (1.2); review FBI's voluminous chain of custody forms provided by FBI, forward to Receiver and trial team, discuss filing those forms with the Court under a Notice of Filing, and coordinate preparation, filing and service of Notice of Filing (.8); coordinate contacting local counsel to make copies and deliver to courtroom the FBI's chain of custody forms, notify Receiver and trial team, and follow up on delivery of records (.2); prepare and send follow-up email to AUSA who received Price's documents from FBI regarding obtaining chain of custody affidavit regarding receipt of those documents and copying to disks sent to Receiver (.2); receive update from associate counsel for FBI regarding status of execution of business records affidavit and possible admission of chain of custody forms subject to submission of business records affidavit (.2); emails to and from trial team members regarding status of execution of business records affidavit and strategy for having chain of custody forms admitted subject to submission of business records affidavit (.2); emails and telephone calls with Receiver and trial team members regarding necessary research on applicability of hearsay exceptions to K. McSwain's testimony regarding A. Price's statements at prior meeting and effect of A. Price's invoking	5.30	1,404.50	KDM

the 5th Amendment at his deposition (.3); work on research project, coordinate further research by C. Perez, and review and analyze various cases and applicable Rules of Evidence including those regarding hearsay and hearsay exceptions (1.7); review cases and case summaries and prepare and send to Receiver and trial team members analysis of relevant cases and applicable Rules of Evidence and application to Defendant's expected use hearsay from A. Price (.5).

[Asset analysis and recovery] (MCBI Action) Review Order Granting Extension of Time to File Response to Defendants' Motions to Dismiss and coordinate calendaring of new deadlines (.1).	0.10	26.50	KDM
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[Asset analysis and recovery] Emails to and from counsel for R. Price regarding Quit Claim Deed to transfer the Price residence to the Receiver and name to which property should be deeded and Receivership Order (.2); follow up on scheduling of mediation with Nelson Mullins and coordinate further call and email to counsel to select date (.1); follow up with counsel for Defendant on scheduling of mediation in the Sabertooth Litigation and coordinate further call and email to counsel for Defendant to select date (.1); review letter from relatives of potential fraudulent transferee regarding transferee's death and coordinate updating of tracking chart (.2).	0.60	159.00	KDM
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[Asset analysis and recovery] Emails to and from counsel for DDS regarding outcome of investigation into silver bars that customer of HW/AU Resources claims to own and confirmation that DDS will continue to freeze those bars until further notice from the Monitor or the Court (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] KM Homes: Revise closing argument powerpoint (0.2); Research regarding inference based on missing witness (2.0)	2.20	330.00	AF
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	[Asset analysis and recovery] KM Homes: Emails to judge's chambers with witness list and exhibit list.	0.20	30.00	AF
	[Asset analysis and recovery] (KM Homes) Research regarding admissibility of hearsay testimony where witness is unavailable due to invoking fifth amendment rights (1.5); review case law and Federal Rules of evidence and provide summary analyses of same (0.5).	2.00	530.00	CP
	[Case administration] Work on Status report.	3.70	555.00	DMC
Apr-22-14	[Asset analysis and recovery] (KM Homes) Prepare for and attend second day of trial (8.5); conference with counsel regarding status, strategy and potential resolution (1.0).	9.50	2,517.50	MME
	[Asset analysis and recovery] (KM Homes) Prepare for second day of trial.	0.50	132.50	PFV
	[Asset analysis and recovery] (KM Homes) Attend second day of trial.	8.00	2,120.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with opposing counsel regarding settlement and prepare email regarding same.	0.60	159.00	PFV
	[Asset analysis and recovery] (KM Homes) Conference with Receiver and G. Giberson regarding settlement.	0.40	106.00	PFV
	[Asset analysis and recovery] (KM Homes) Prepare for and attend second day of trial, and conference with witness, Mr. Shirley (9.2); conferences with Receiver and P. Valori regarding strategy and potential settlement and with opposing counsel regarding settlement (1.8).	10.20	2,703.00	GFG
	[Asset disposition] Emails with prospective realtor for Price residence in Valdosta, GA regarding proposed listing agreement, review that Agreement and request revisions (.3).	0.30	79.50	KDM

<p>[Asset analysis and recovery] (KM Homes) Continue working with C. Perez on research on hearsay exceptions and effect of declarant's invocation of 5th Amendment for purposes of preventing K. McSwain from testifying regarding A. Price's statements at prior meeting, review and analyze various cases, case summaries prepared by C. Perez, and Rules of Evidence (1.8); prepare and send to Receiver and trial team members several different analyses of cases and Rules and application of those cases and Rules to Defendant's application to Defendant's expected use hearsay from A. Price (1.4); review hearing proceeding memorandum from the Court regarding the first day of trial (.1); emails to and from FBI associate counsel regarding status of execution of business records Declaration for chain of custody forms (.2); email from FBI agent with executed Declaration, review that Declaration and send to Receiver and trial team (.2); telephone calls and emails to and from Receiver regarding Court's directed verdict in favor of Receiver and issues being considered by the jury (.2).</p>	3.90	1,033.50	KDM
<p>[Asset analysis and recovery] Email from Jim Price regarding information related to loan that A. Price made to principal of A&D Hospitality and documents being produced (.2).</p>	0.20	53.00	KDM
<p>[Case administration] Review Statement from tax collector for the Longboat Key property and consider possible revision to proposed Partial Settlement Agreement with FDIC-R to cover payment of those taxes (.2); assist with preparation of Receiver's Status Report, providing information and updates to be included in Report (1.0).</p>	1.20	318.00	KDM
<p>[Asset analysis and recovery] (KM Homes) Continue research regarding admissibility of hearsay testimony where witness is unavailable due to invoking fifth amendment rights (1.4); review case law and Federal Rules of evidence and provide summary analyses of same (0.2).</p>	1.60	424.00	CP

	[Case administration] Work on status report.	5.10	765.00	DMC
Apr-23-14	[Asset analysis and recovery] (KM Homes) Review settlement offers, agreements and finalizing with court and attorneys (3.5); telephone calls with SEC regarding resolution (.2).	3.70	980.50	MME
	[Case administration] (KM Homes) (No charge) Return travel to Miami	2.00	0.00	MME
	[Asset analysis and recovery] Emails, phone calls, and meeting regarding settlement.	1.00	265.00	PFV
	[Asset analysis and recovery] Review proposed settlement agreement and revise.	0.40	106.00	PFV
	[Asset analysis and recovery] Attend conference with Judge to announce settlement.	0.40	106.00	PFV
	[Asset analysis and recovery] Additional conferences and meetings regarding settlement and work on revisions to written settlement agreement.	1.30	344.50	PFV
	[Asset analysis and recovery] (KM Homes) (No charge) Travel from trial.	2.00	0.00	PFV
	[Asset analysis and recovery] (KM Homes) Attend trial at the court house and participate in settlement negotiations, review proposed settlement documents and make changes, organize wind down of trial and disposition of trial materials, conferences Receiver regarding settlement and post trial issues, conferences with trial team, telephone conference with counsel for the FDIC regarding trial results and cross claims issues.	3.70	980.50	GFG
	[Asset analysis and recovery] (KM Homes) (No charge) Return travel to Miami.	2.00	0.00	GFG
	[Asset disposition] Email from realtor for marketing and sale of Price residence in Valdosta, GA regarding revised Listing	0.20	53.00	KDM

Agreement, review Agreement to confirm requested revisions were made, and present to Receiver for review and execution (.2).

[Asset analysis and recovery] (KM Homes) Telephone calls and emails with Receiver and trial team members regarding status of jury's consideration of remaining issue, proposed terms of settlement with Defendant, and determining whether notice to all parties and Court approval of such settlement is required (.5); telephone calls to and from counsel for SEC regarding the proposed terms of settlement and revisions and additions to settlement terms (.5); report to Receiver and trial team members discussions with and approval of counsel for SEC regarding proposed settlement agreement and procedure for having Court approve it (.4); review proposed initial draft of Settlement Agreement, strategize with team members and counsel for SEC regarding certain revisions to facilitate enforcement and collection (.5); prepare paragraphs to be inserted into the Settlement Agreement to facilitate collection and enforcement, send to Receiver and team members, and strategize regarding procedure for having Court approve the Agreement in the enforcement action and the action against KM Homes (.6); review Hearing Proceeding Memorandum for second day of trial and discuss status of settlement discussions with trial team members (.2); review Hearing Proceeding Memoranda regarding the approval of the settlement and the dismissal of the case and the Order dismissing case pursuant to Settlement Agreement, report the outcome to counsel for the SEC, exchange emails with counsel for the SEC regarding the outcome and whether Order approving Settlement in the main receivership case is necessary, and propose procedure to Receiver and trial team members (.3); meet with Receiver and trial team members regarding outcome of trial, specific terms of settlement, Court's approval of settlement, and lack of need to seek Court approval in main receivership case and review executed Settlement Agreement (.5).	3.50	927.50	KDM
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	[Asset analysis and recovery] Telephone calls to and from counsel for the Williams regarding acceptance of settlement offer and preparation of Settlement and Release Agreement (.2); report to Receiver acceptance of settlement offer and coordinate preparation of Agreement, Motion to Approve it, and Order approving it (.1).	0.30	79.50	KDM
	[Case administration] Continue assisting with preparation of Receiver's Status Report, including providing information regarding the status of sale of remaining piece of real property, acquisition of new real property from the Prices, status of resolution of outstanding disputes with FDIC-R, and outcome of KM Homes action (1.1).	1.10	291.50	KDM
	[Case administration] Review docket for KM Homes action [0.3]; review docket for MCBI action [0.3]; review account reconciliation [0.3]; review clerk's minutes for KM Homes trial [0.3]; review asset inventory [0.4]; confer with team members regarding surrender of Price residence [0.2]; review listing agreement [0.2]; Work on status report [4.3].	6.30	945.00	DMC
Apr-24-14	[Asset analysis and recovery] Review proposal from FDIC and conferences with the Receiver and counsel regarding same, review insurance related issues (1.5); work on preparation for Nelson Mullins mediation, review motion to dismiss 10b5 complaint, emails with counsel regarding updates and strategy (.9).	2.40	636.00	GFG
	[Asset disposition] Coordinate sending executed Listing Agreement to realtor for Price residence in Valdosta, GA and request fully executed copy (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Review letter regarding A&D Hospitality and work on strategy for claims to be filed against certain third parties (.2); emails with Receiver and team members regarding gathering evidence from potential witnesses to support claims against former counsel to Defendants and	0.40	106.00	KDM

issues related to communications with A. Price (.2).

	[Case administration] Review first draft of Seventh Report of Receiver and coordinate preparation of section regarding the life insurance companies motions to intervene, to stay consideration of Receiver's plan, and for stay relief to sue the Receiver (.9); exchange emails with Receiver and team members regarding FDIC-R's offer to resolve all issues between and claims against the respective receivership Estates and strategize regarding formulating counter-offer to FDIC-R latest offer (.3).	1.20	318.00	KDM
Apr-25-14	[Asset disposition] Emails with realtor and M. Dhanji regarding status of having landscaper clean up the grounds of the Longboat Key property and the estimate from original landscaper to complete the job, and coordinate obtaining estimate from another landscaper (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Work on formulating claims against SCAN and its principals (.2); emails with counsel for MCBI regarding FDIC-R's proposal to stay the action by MCBI against the FDIC-R pending settlement negotiations between the FDIC-R and the Receiver (.2); continue working on formulating claim against SCAN and its principals (.2); provide information for purposes of preparation of Settlement Agreement with fraudulent transferees (.1).	0.70	185.50	KDM
	[Business operations] Emails with tax consultant regarding whether Estate received any rental income from real properties sold for purposes of preparation of tax returns for the Estate (.2).	0.20	53.00	KDM
	[Case administration] Revise additional sections of Seventh Report of Receiver and coordinate further revisions and additions (1.1).	1.10	291.50	KDM

	[Asset analysis and recovery] Read letter from Price regarding A& D Hospitality and strategize regarding Receiver's claims.	0.30	45.00	AF
	[Asset analysis and recovery] Draft Motion to Approve Settlement Agreement with fraudulent transferees (1.3); begin drafting settlement agreement (0.5).	1.80	270.00	AF
	[Case administration] Confer with forensic accountant regarding status report and tasks completed by Kapila and Company [0.2]; review and revise narrative submitted by forensic accountant [0.9]; revise seventh status report [0.8].	1.90	285.00	DMC
Apr-27-14	[Case administration] Review and revise second draft of Receiver's Seventh Status Report (2.8).	2.80	742.00	KDM
Apr-28-14	[Case administration] Continue reviewing and revising Second Draft of Receiver's Seventh Status Report, review Settlement Agreement with KM Homes for purposes of summarizing terms for Report, and confer with team members regarding various activities during the reporting period to be explained to the Court in the Report (3.6); receive report from G. Giberson regarding latest settlement negotiations with counsel for FDIC-R, schedule strategy session with Receiver and team members, and discuss arguments to present to FDIC-R counsel in support of the Receiver's counteroffer (.3).	3.90	1,033.50	KDM
	[Asset analysis and recovery] Continue preparing draft Settlement Agreement with the Williams.	2.00	300.00	AF
	[Case administration] Review and revise status report [0.9]; review and compile exhibits to status report for submission to Receiver [0.8].	1.70	255.00	DMC
Apr-29-14	[Asset analysis and recovery] Meet with counsel regarding various claims, status and strategy.	0.40	106.00	MME

[Case administration] Review and revise Seventh Status Report.	1.30	344.50	MME
[Asset disposition] Telephone call from realtor for Price residence regarding marketing strategy, listing price, taking pictures of the house, gaining access, and changing the locks (.2); follow up with counsel for R. Price regarding sending keys to the house to realtor and exchange emails with counsel and realtor to coordinate sending keys (.2).	0.40	106.00	KDM
[Asset analysis and recovery] Emails to and from Jim Price regarding the outcome of the KM Homes trial and his recent communications with A. Price and the status of the criminal action against him (.3); review and revise Settlement and Release Agreement with fraudulent transferee, coordinate further revisions and additions, and forward to Receiver for review and approval (.6); meet with Receiver and strategize with team members regarding upcoming pre-suit mediation with Nelson Mullins (.3); telephone call from A. Price regarding outcome of KM Homes trial and strategize with team members regarding obtaining consent from his criminal defense counsel to discuss further issues including his involvement and services provided by Nelson Mullins in preparation for mediation (.4); meet with Receiver regarding status of locating and sending demand letters to remaining fraudulent transferees who we have not yet located and status of receiving responses from other transferees and net winning investors who received demand letters and coordinate further efforts to locate missing fraudulent transferees and follow up on all demand letters (.3); meet with Receiver and MC Espenkotter regarding preparation of and strategy for claims to be alleged in Complaint against MCBI and 2012 officers and directors and Complaint against certain financial advisors covered under the Evanston Insurance policy (.4); meet with Receiver and M. Visconti regarding preparation of Complaints against O. Lwis (.2); report to Receiver status of preparation of Complaint against SCAN International and its principals and Complaint	2.70	715.50	KDM

against A&D Hospitality and its principal and affiliate (.2).

	[Case administration] Prepare for meeting with Receiver and team members to continue discussing the FDIC-R's settlement offer and to formulate a counteroffer and provide Receiver with relevant documents for discussion (.2); review and revise Exhibits to Seventh Report of Receiver, coordinate further revisions, and provide to Receiver for review and approval (.5); revise Seventh Report in accordance with revisions of Receiver (.5).	1.20	318.00	KDM
	[Asset analysis and recovery] Strategize regarding O. Lwis complaint (.2)	0.20	53.00	MDV
	[Asset analysis and recovery] Revise Settlement Agreement regarding the Williams.	0.70	105.00	AF
	[Case administration] Review, revise and finalize exhibits to Receiver's Seventh Status Report.	1.30	195.00	DMC
	[Asset analysis and recovery] Assist attorney D. Carnright in finalizing exhibits for the Receiver's Seventh Status Report.	0.60	45.00	pl
Apr-30-14	[Case administration] Meet with counsel regarding FDIC issues (1.0); meet with counsel regarding forensic accounting issues and potential causes of action (.6).	1.60	424.00	MME
	[Asset analysis and recovery] Conference with team regarding litigation strategy and FDIC settlement.	1.00	265.00	PFV
	[Asset analysis and recovery] Conference with the Receiver and counsels regarding FDIC-R proposal and response (1.0); conferences regarding written response, review emails from FDIC-R's counsel, draft and circulate written counter- proposal to the FDIC-R's counsel based on discussions during conference (.3).	1.30	344.50	GFG

[Asset disposition] Emails with counsel for R. Price regarding status of delivery of keys and garage remotes to Price residence to our realtor and exchange emails with realtor regarding same and granting him access to inspect and take pictures for purposes of marketing the property for sale (.3).	0.30	79.50	KDM
[Asset analysis and recovery] Confer with Receiver regarding revisions to proposed Settlement and Release Agreement with the Williams, make further revisions and coordinate finalizing of Agreement (.2); email and letter from counsel for another fraudulent transferee presenting proposal to settle the Receiver's claim, discuss proposal with Receiver and formulate counteroffer, and send email with counteroffer to counsel (.5).	0.70	185.50	KDM
[Case administration] Make further revisions to Receiver's Seventh Report in accordance with Receiver's edits, make final revisions to Exhibits to Report, review and make final revisions to Report, and coordinate filing with the Court (1.1); emails with counsel for FDIC-R regarding timing of receiving response to FDIC-R's settlement proposal (.2); meet with Receiver and team members to strategize regarding FDIC-R's settlement proposal and the effect of its terms on Receivership and investors and to formulate terms of counteroffer to be proposed to FDIC-R (1.0); review and work on revising email to counsel for FDIC-R setting forth terms of Receiver's counteroffer (.5).	2.80	742.00	KDM
[Case administration] Review time entries for purposes of finalizing exhibits to status report.	1.50	225.00	DMC

 HOUR TOTALS:

1241.40

\$264,279.00

ATTORNEY/PARALEGAL SUMMARY

NAME	INITIALS	HOURS	RATE	AMOUNT
Melanie E. Damian	MME	130.90	\$265.00	\$28,567.00
Peter F. Valori	PFV	138.60	\$265.00	\$34,662.00

Guy F. Giberson	GFG	369.50	\$265.00	\$94,313.50
Kenneth D. Murena	KDM	252.60	\$265.00	\$62,752.00
Melissa Damian Visconti	MDV	3.30	\$265.00	\$874.50
Amanda Fernandez	AF	150.60	\$150.00	\$22,590.00
Casandra Perez Murena	CP	16.50	\$265.00	\$4,372.50
David M. Carnright	DMC	114.40	\$150.00	\$12,630.00
Paralegal	pl	65.00	\$75.00	\$3,517.50

DISBURSEMENTS

	Pacer Photocopy	227.90
Mar-31-14	Service Fee: Mary Hunneycutt 3/28/14	15.00
	Travel to Statesboro air KDM MME 3/17/14	800.00
	Travel to Statesboro hotel KDM MME 3/17/14	300.58
	Telephone conference with Aubrey Price in Jail fee	25.00
	Gas for Rental Car Statesborough 3/17/14	30.25
	Rental Car Statesboro 3/17/14	232.00
	Telephone Conference with Aubrey Price 3/31/14-4/1/14	2.43
Apr-30-14	Car Rental for Deposition GFG 4/14/14	86.48
	Hotel For Deposition GFG 4/14/14	127.79
	Car Rental for Interview of Aubrey Price GFG 2/21/14	64.68
	Airfare for Interview of Aubrey Price GFG 2/21/14	408.00
	Airfare for Deposition GFG 4/14/14	440.00
	Hotel for Interview of Aubrey Price GFG 2/21/14	100.57
	Service Fee: Patrick Tuley 4/10/14	154.00
	Service Fee: Stephen Roberts 4/10/14	183.00
	Court Reporter: Aubrey Price Attendance and Transcript 4/15/14	895.20
Feb-28-14	Photocopies 1275 @ 0.12	153.00
Mar-27-14	Photocopies KM Homes 182 @ 0.18 Color copies	32.76

Mar-31-14	Photocopies Document Production 10/18/13	31.00
	Photocopies 2432 @ 0.12	291.84
Apr-30-14	Photocopies 5035 @ 0.12	604.20
Mar-10-14	Postage 5 @ 6.48	32.40
Mar-19-14	Postage 5 @ 6.48	32.40
Mar-21-14	Postage 1 @ 0.49	0.49
Mar-25-14	Postage 1 @ 6.48	6.48
Mar-31-14	Postage 1 @ 1.19	1.19
Mar-12-14	Filing Fee: Pro Hac Vice for Peter Valori	150.00
Mar-20-14	Filing Fee: Apostille Power of Attorney	6.00
Apr-03-14	Filing Fee: Articles of Organization for PFG, LLC and PFGRE, LLC	60.00
Apr-07-14	Filing Fee: Apostle Power of Attorney	6.00
Mar-31-14	Filing Fee: Corporate Filing PFG, LLC	138.75
	FedEx Shipment Clerk of GSCCCA 3/21/14	21.05
	FedEx Shipment Aubrey Lee Price 3/21/14	21.05
	FedEx Shipment Clerk of GSCCCA 3/24/14	21.55
	FedEx Shipment Andrew Worrell 3/25/14	21.05
	FedEx Shipment Captain Staten 3/27/14	21.05
Apr-08-14	FedEx Shipment Andrew Worrell 4/3/14	21.05
	FedEx Shipment Captain John Staten 4/3/14	21.05
	FedEx Shipment Certification Department 4/3/14	21.05
Apr-15-14	FedEx Shipment Captain Staten 4/7/14	21.55
	FedEx Shipment David O'Neil 4/8/14	22.50
	FedEx Shipment George Venizelos 4/8/14	22.62
	FedEx Shipment Loreta Lynch 4/8/14	22.62
	FedEx Shipment Clerk GSCCCA 4/8/14	21.05
	FedEx Shipment Donald McKinley 4/8/14	22.62
	FedEx Shipment Clerk GSCCCA 4/9/14	21.55
	FedEx Shipment Certification Department 4/10/14	21.55
Apr-16-14	FedEx Shipment John Pate 4/10/14	67.44
Apr-22-14	FedEx Shipment Special Loan Department 4/11/14	22.62
	FedEx Shipment Michael Howard 4/14/14	22.62
Mar-24-14	Witness Fee: Patrick Tuley	27.02
	Witness Fee: Mary P. Hunneycutt	27.02
	Witness Fee: Keith McSwain	44.97
Apr-04-14	Witness Fee: Stephen Roberts	36.19
Mar-31-14	Service Fee: Patrick Tuley 3/31/14	65.00
Feb-28-14	Mediation Services: KH Homes (2/27/14)	2,430.00
Mar-31-14	Parking Airport from Statesboro 3/17/14	33.00
Apr-30-14	Parking for Deposition GFG 4/14/14	30.00
Feb-28-14	Data Asset Research of Potential Fraudulent Transferees	4.00
	Data Asset Research of Potential Fraudulent Transferees	8.00

	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
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	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
Mar-31-14	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Data Asset Research of Potential Fraudulent Transferees	8.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
Apr-30-14	Data Asset Research of Potential Fraudulent Transferees	8.00	
	Data Asset Research of Potential Fraudulent Transferees	23.00	
	Data Asset Research of Potential Fraudulent Transferees	4.00	
	Totals	<hr/> \$8,901.23	
	Total Fee & Disbursements	<hr/> \$273,180.23	
	Previous Balance	283,551.68	
	Balance Now Due	<hr/> \$556,731.91	

Terms: Balance Due Upon Receipt

Payments received after the billing date of Apr 30/14 may not be included on this statement.

TAX ID Number 20-1324240

6th Floor
Miami, FL 33131

Phone # 305-374-5710
Fax # 305-374-5718
www.integro-advisers.com

Date 5/30/2014

Invoice # 2014-07

Terms Due on receipt

Bill To

Damian & Valori LLP
Melanie Damian
1000 Brickell Avenue
Suite 1020
Miami, FL 33131

Project

450-12-01

Date	Description	Qty	Price	Amount
4-Feb	attempt calls to Marroquin	0.5	\$	100.00
11-Feb	attempt calls to Marroquin	0.5	\$	100.00
12-Feb	call with Marroquin	1	\$	200.00
20-Feb	email exchanges , review of response by Marroquin	1	\$	200.00
7-Mar	translation of email w Marroquin	1	\$	200.00
9-Mar	email summary prepared's ent to MED	0.5	\$	100.00
20-Mar	week email exchanges	0.5	\$	100.00
1-Apr	reviews file/ notes on Osama farm; conf call with MED, Pate, Alfredo	2	\$	400.00

Please remit payment to address noted above.

\$1,400.00

Total